

Chapter 2

Written Comments and DOE Responses

Commentor No. 1: Hyun Lee
Heart of America Northwest

08/07/00 MON 09:12 FAX
07/27/2000 12:38 2853821148

HEART OF AMERICA NW

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"Advancing the Quality of Life."

Honorable Bill Richardson,
Secretary of Energy
U.S. Department of Energy
1000 Independence Ave. SW
Washington, D.C. 20585

Andrew Athy, Jr., Chair,
Secretary of Energy's Advisory Board
U.S. Department of Energy
1000 Independence Ave. SW
Washington, D.C. 20585

Dear Secretary Richardson and Mr. Athy:

We are dismayed that during the long awaited for conference call held last Thursday, Department staff were not prepared or willing to discuss issues related to the Secretary's first two commitments regarding the FFTF reactor EIS and the public comment process.

Initial review of the Draft EIS confirms our fears, expressed during our meeting with you of June 10, that analyses of impacts, and even definition of the scope, has been manipulated by reactor restart advocates. Furthermore, the unwillingness to address the concerns of the Hanford Public Interest Network citizen groups regarding the public notice and comment plans for the Draft EIS, stated in our prior letter to you, would appear to lock the Department into legally inadequate public notice and comment plans and a confrontational course. Plans and procedures for notice and the conduct of hearings require 30 to 45 days of notice and appear locked in from the publication in the Federal Register.

The first commitment of the Secretary was to ascertain if the EIS included independent analysis of:

a) the need for medical isotopes and economic analyses of whether demand will be met by non-DOE investments and market forces; and,

b) whether safety of the reactor and ancillary facilities was addressed. This was to be followed by serious discussion between ourselves and the Department, through the offices of Mr. Athy.

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Seattle WA 98101

206/382-1014 • fax 206/382-1148 • e-mail: office@heartofamericanorthwest.org
www.heartofamericanorthwest.org
Craig M. Haller, J.D. Executive Director

Response to Commentor No. 1

1-1: The Draft NI PEIS was prepared in compliance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S.C. 4321 et seq.), Council on Environmental Quality Implementing Regulations (40 CFR 1500 et seq.), and DOE's Implementation Regulations (10 CFR Part 1021). Other applicable laws, regulations, and requirements are discussed in Chapter 5 of Volume 1. Environmental impacts were analyzed for all of the alternatives and options (See Chapter 4 of Volume 1). None of the analysis was manipulated to obtain results favorable to any alternative. Details of the analysis are given in Appendixes H through J of Volume 2. The scope of the NI PEIS was determined in accordance with the laws and regulations cited above after public scoping meetings (See Section 1.4 of Volume 1 and Appendix N of Volume 2).

Public notice was given and public hearings on the Draft NI PEIS were conducted in accordance with federal law and regulations cited above. Chapter 1 of Volume 3 describes the public comment process used for the NI PEIS.

Dialogue between supporters and opponents of Alternative 1, Restart FFTF, was held in Seattle, Washington on September 5 and 6, 2000. According to the facilitator (Letter to the Secretary of Energy from Hallmark Pacific Group, LLC, dated September 22, 2000), no unanimous agreement was reached by the five participants in each of two panels. DOE observed, but did not participate in, the discussions. DOE is required to comply with statutory and regulatory requirements regardless of the outcome of dialogue among advocates and opposition for any particular alternative.

1-2: As described in Section 1.2 of Volume 1, forecasts of medical isotope needs were provided by the Expert Panel (Wagner et al. 1998) and the Nuclear Energy Research Advisory Committee (NERAC 2000a). DOE agrees with these projections. Mission effectiveness of Alternatives is discussed in Sections 2.7.3 and 2.8 of Volume 1.

Members of the expert advisory groups were selected for their medical credentials and knowledge of medical isotopes. The expert groups were directed to provide their best technical assessment of the need for medical isotopes over the next two decades (Wagner et al. 1998). Projections of market growth were given by the Expert Panel in terms of dollars, not percentage of the population. The Panel did not project

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Review of the EIS (and we must urge you to take notice of the fact that the table of contents of the EIS was faxed to us less than 24 hours before our conference call and just two days before the entire EIS was handed to some reactor proponents) confirms that the EIS does not meet these basic expectations (and legal requirements).

[Note regarding medical isotopes: We have repeatedly objected to the EIS adopting a presumed need for isotopes based on the non-credible studies done on behalf of program advocates. The EIS adopts a forecast for need that has no economic basis or credibility. The convening of a panel composed of individuals with direct financial conflicts of interest vis a vis reactor and other Department contracts, to compare the two studies commissioned by advocates for production as part of their lobbying efforts, is NOT an independent economic assessment of demand and forecast capacity. We will demonstrate in further discussions the lack of credibility of this claimed forecast and reliance on advocates' documents to claim there is a need justifying the restart of the FFTF reactor. Suffice to say, one of those "studies" uses a ruler to project an incredible line of growth in use of medical isotopes, without differentiation, that would take their use from 1% of the population today to over half the population annually in 30 years of reactor use. The advocates' assumptions have already failed to live up to reality. A proper analysis will utilize econometrics, differentiate between types of isotopes and facilities to meet demand for each isotope, examine the market forces relative to investment in production facilities by other nations, universities or hospitals, and private investors.]

[As regards safety issues, the recent admissions of Hanford management's misleading and false statements regarding potential radiation/Plutonium releases during and after the Hanford fire, and their multiple failures to comply with emergency planning and reporting of potential hazardous materials pursuant to EPCRA, SARA, RCRA, and Washington Dangerous Waste Law reveal the hollowness of assurances that the department has considered safety previously, and the legal inadequacy of the EIS for failure to address evacuation planning, ability to meet external regulations and licensing standards, etc...]

While progress was made on last week's conference call defining the time frame and format for use of independently facilitated, principled negotiations between reactor restart proponents and opponents, the Department's staff appears to have failed to recognize that the value of such negotiations includes the opportunity to have reactor opponents formally agree not

Response to Commentor No. 1

percentages of the population that would benefit from medical isotopes. While the identification of specific isotopes as a focus for research or clinical application is sometimes uncertain, the Expert Panel's projection of expanding needs for medical isotopes is reasonable (Section 1.2.1 of Volume 1). DOE agrees with the Expert Panel's projections. The Expert Panel's projections were made in 1998. While recent increases in the market for medical isotopes suggest that the Panel's projections are correct, the accuracy of the Panel's projections will not be evident for several years. The purpose of this NI PEIS is to describe DOE's alternatives (Section 2.5 of Volume 1) for meeting its mission objectives and to evaluate the environmental impacts that would result from implementation (Chapter 4 of Volume 1) of the alternatives. As discussed in Section 2.6 of Volume 1, alternatives that would not meet DOE's mission requirements were dismissed.

1-3: Safety and health were foremost considerations during preparation of the NI PEIS. No radiation or hazardous materials were released from facilities at the Hanford Site as a result of the wild fires of that occurred in June 2000. The fires did result in re-suspension of radioactive materials that were already in the environment. The amount of radioactive material that was re-suspended was only slightly above natural background levels and required several days of analysis to quantify. Information on this event has been made available to the public and can be accessed at <http://www.Hanford.gov/envmon/index.html>. This site also provides a link to information on the independent offsite air monitoring that was conducted by the U.S. Environmental Protection Agency. Estimates of the impacts of a spectrum of accidents that could occur under Alternative 1, Restart FFTF, at candidate facilities at the Hanford Site are given in Section 4.3 of Volume 1 and Appendix I of Volume 2. Applicable laws and regulations are described in Chapter 5 of Volume 1. DOE complies with all applicable laws and regulations.

Commentor No. 1: Hyun Lee (Cont'd)

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to challenge the adequacy of the EIS and take other available legal actions if an agreement is reached. Such a result is only achievable if the Department meets the commitments of the Secretary regarding EIS content and provides for an adequate public notice and comment through a participatory planning effort. Time is running out for legally adequate notice and comment preparations. We are not willing to wait for a written response from the Office of Nuclear Energy to our letter of last week. The involvement of senior staff apart from the programmatic advocates for the EIS and reactor restart will be necessary in discussions following up on the Secretary's first two commitments on EIS scope and regarding the legal adequacy of the EIS.

As of today, despite your efforts, there is a lack of credibility in the process and substantive product. It is clear from our conference call that there will not be adequate public notice, and the conduct of the hearings will not meet basic requirements, amongst other alarming developments. We urge that there be an immediate discussion next week of our previously outlined proposals to resolve these concerns.

Sincerely yours,


Hyun Lee, JD, LL.M.
Heart of America Northwest

Thomas Carpenter, JD
Government Accountability Project

Gerald Pollet, JD
Heart of America Northwest

CC: Mays Seiden,
Senator Ron Wyden
Rep. Adam Smith
Rep. Jay Inslee
Rep. Brian Baird
Rep. Jim McDermott
Rep. David Wu
Rep. Earl Blumenauer
Rep. Peter DeFazio

1-1

Response to Commentor No. 1

Commentor No. 2: Stanley Hobson, INEEL Citizens Advisory Board



Citizens Advisory Board

Idaho National Engineering and Environmental Laboratory

00-CAH-057

August 16, 2000

Colette E. Brown
Document Manager
Office of Space and Defense Power Systems (NE-50)
Office of Nuclear Energy, Science, and Technology
U.S. Department of Energy
19901 Germantown Road
Germantown, MD 20874

Dear Ms. Brown:

Chair:
Stanley Hobson

Vice Chair:
Jan M. Edelstein

Members:
James Bondurant
Wynona Beyer
Karen Corrigan
Annemarie Goldstein
Andy Guerra
Robert D. Kaestner
David Kipping
Patricia Klahr
Lawrence Knight
R.D. Maynard
Marilyn Paarmann
F. Dave Rydalsch
Monte Wilson

Ex-officio:
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Gerald C. Bowman

Jason Staff:
Carol Cole
Amanda Jo Edelmayer
Kathy Grebstad
Wendy Green Lowe
Teri Tyler

Note: The Site-Specific Advisory Board for the Idaho National Engineering and Environmental Laboratory (INEEL), also known as the INEEL Citizens Advisory Board (CAB), is a local advisory committee chartered under the Department of Energy's (DOE) Environmental Management SSAB Federal Advisory Committee Act Charter.

The INEEL CAB recently received copies of the Draft Programmatic Environmental Impact Statement for Accomplishing Expanded Civilian Nuclear Energy Research and Development and Isotope Production Missions in the United States, Including the Role of the Fast Flux Test Facility (DOE/EIS-0310D). We also received the orange postcard inviting our comment and announcing the public comment period. We look forward to reviewing the draft document and submitting our comments as a consensus recommendation.

The INEEL CAB develops its recommendations through consensus-building processes and they are finalized at meetings of the full board. Our next meeting will be held on September 19 and 20, 2000, in Jackson, Wyoming. The orange post card indicates that the public comment period for the Draft PEIS will end on September 18, 2000, one day before our meeting. **We therefore respectfully request an extension in the public comment period to allow our full Board to participate in the process of developing a recommendation in accordance with our normal procedures.** We should be able to complete our finalization processes by no later than close of business September 22, 2000.

We appreciate your consideration of this request. Thank you for your prompt response to this request.

Sincerely,

Stan Hobson
Chair, INEEL CAB

cc: Carol Borgstrom, DOE-HQ, Office of NEPA Policy and Assistance
Beverly Cook, DOE-ID
Carolyn Huntoon, DOE-HQ
Martha Crosland, DOE-HQ
Fred Butterfield, DOE-HQ
Gerald Bowman, DOE-ID
Kathleen Trever, State of Idaho INEEL Oversight
Wayne Pierre, U.S. Environmental Protection Agency Region X

Jason Associates Corporation • 477 Shoup Avenue, Suite 201 • Idaho Falls, Idaho 83402
Phone • (208) 522-1662 Fax • (208) 522-2531
<http://www.ida.net/users/cab>

Response to Commentor No. 2

2-1

2-1: As stated in the Notice of Availability (65 FR 46443 et seq.), the comment period for the NI PEIS began on July 28, 2000 and extended through September 18, 2000. Council on Environmental Quality implementing regulations (40 CFR 1506.10(c)) require that at least 45 days be allowed for public comment on a draft environmental impact statement. DOE notified the INEEL CAB that although the public comment period would not be extended beyond the September 18, 2000 deadline, late comments would be considered to the extent practicable. Responses to the subsequent INEEL CAB comments are shown under Comment Number 2050 of this comment response document (Volume 3 of the NI PEIS).

Commentor No. 3: Lee A. Fisher

Response to Commentor No. 3

01/25/2002 09:41 4255498892

LEE A FISHER

PAGE 01

Draft PEIS Comment Form

I strongly urge you to Restart
FFTF, Alternative #1.

Many of my friends have been
cured by implantation of
'seeds' particularly those with
prostate problems.

Keep the skills alive for production.
Sorry to hear you've had to buy
isotopes from Russia. How many
years does it take to learn that
you can't - and shouldn't trust them!!

There are several ways to provide comments on the Nuclear Infrastructure
PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Lee A Fisher

Organization: Retired

Home/Organization Address (circle one): 4215 135th Ave SE

City: Bellevue State: WA Zip Code: 98006

Telephone (optional): 425 746-4215

E-mail (optional): Fisherla@msn.com

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19001 Germantown Road • Germantown, MD 20874
Toll-free telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

3-1

3-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

3-2: The United States has purchased nine kilograms of plutonium-238 from the Russians since 1992. DOE is now considering re-establishing a domestic production capability of plutonium-238 at a United States facility because it is in our national interest to assure that the United States does not rely on any foreign government to support the NASA space program. A more detailed explanation of the need for a domestic source of plutonium-238 is found in Section 1.2.2 of Volume 1.

3-2

Commentor No. 4: J. E. Kurtz

Draft PEIS Comment Form

From this draft, it is obvious that the FFTF option is prime candidate. It can perform all missions and does not cause the generation of another site to cleanup. Even though cost was not part of the evaluation, it appears that it would be overall cost effective. Your discussion of open session comments given at public meetings does not really discuss all the positive comments on a FFTF Restart. It appears to have been "politically" correct to appease the minority opposition. It appears that any alternative beyond FFTF would be too prohibitive and not meet all mission goals. If FFTF is not selected as preferred alternative, it would be a mistake and would only deepen peoples belief that politics runs the government not good common sense. As a taxpayer, I would feel "ripped" off again.

Select FFTF as the option -- it is good, common, technical, and cost effective sense!

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- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): J. E. Kurtz

Organization: _____

Home Organization Address (circle one): 2817 W. Klammath Ave

City: Kennewick State: WA Zip Code: 99336

Telephone (optional): 509-735-9390

E-mail (optional): JEKurtz@worldnet.att.net

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Corinne E. Brown, NE-50
U.S. Department of Energy • 1990 I. Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

7/12/00



Response to Commentor No. 4

4-1

4-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

4-2

4-2: DOE's presentation and comment session at the draft NI PEIS hearings provided information about the NEPA process, alternatives described in the PEIS, and specific facilities, including FFTF.

4-1

Commentor No. 5: Fred Maienschein

Response to Commentor No. 5

Draft PEIS Comment Form

7-25-00

(refer to p S-18)

The Oak Ridge Electron Linear Accelerator at the Oak Ridge National Laboratory is NOT permanently shut down. It is, in fact, operating today and it operates regularly as needed for a variety of research programs.

The appropriate contact is Dr. Duane Larson at 1-865-574-6119.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): Dr. Fred Maienschein

Organization: Oak Ridge National Laboratory (retired)

Home/ Organization Address (circle one): 838 West Outer Dr

City: Oak Ridge State: TN Zip Code: 37830

Telephone (optional): (865) 483-3805

E-mail (optional): fmaien@ispchannel.com

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-60
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

5-1

5-1: Tables S-2 and 2-4 have been changed in the Final NI PEIS to reflect the correct operational status of the facility.

Commentor No. 6: Stephen S. Hart

Draft PEIS Comment Form

After reviewing the Draft PEIS, I am strongly opposed to restarting the FFTE. Having worked at both Hanford and INEEL, the lower potential exposure to the population and much lower overall population in the vicinity of INEEL should be the determining factor. Therefore, I support Alternative 5, with Alternative 2, Option 8, held in reserve for the future if plutonium-238 supplies from Russia should be interrupted for either political or supply reasons. However, economic climate should not be a reason for interrupting the purchase of Russian plutonium-238 as keeping those supplies out of the hands of third parties should be of overriding priority. I would, in fact, support an increase in the rate of annual purchase of plutonium-238 from Russia under the DOE contract discussed on page S-5 of the PEIS, even if it meant that some current DOE remediation programs had to be cut to pay for it. I do not favor restarting any currently shut-down reactors at any DOE facility for this or any other program.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Stephen S. Hart

Organization: _____

Home/Organization Address (circle one): 2284 S. Hoyt St.,

Lakewood, CO

City: Lakewood State: CO Zip Code: 80122

Telephone (optional): _____

E-mail (optional): stephen.hart@jrm.com

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

Response to Commentor No. 6

- 6-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTE. DOE further notes the commentor's support for Alternative 5, Permanently Deactivate FFTE, with Alternative 2, Use Only Exiting Operational Facilities, Option 8, Irradiate at ATR and HFIR and Process at FDPF, held in reserve for future production of plutonium-238 should supplies from Russia be interrupted.
- 6-2: See response to comment 6-1.
- 6-3: The purpose of the existing DOE contract to purchase plutonium-238 from Russia is not to keep this material out of the hands of third parties but rather to ensure a supply for NASA space mission radioisotope power sources. Unlike plutonium-239, the radioisotope plutonium-238 is not a proliferation risk because its nuclear properties preclude it from use in a nuclear weapon. The International Atomic Energy Agency (IAEA) exempts plutonium that is more than 80 percent plutonium-238 from consideration as special fissionable material subject to safeguards. All plutonium-238 production alternatives in this EIS will produce this isotope in greater than 80 percent purity. Therefore, the purchase of plutonium-238 from Russia has no effect on nonproliferation of nuclear weapons since plutonium-238 is not a nuclear weapon material. Along with budget constraints, DOE has not purchased larger quantities of plutonium-238 from Russia because extended storage of this radioisotope results in the buildup of other radioisotopes which require their removal and pose a significant radiological health hazard to workers.
- 6-4: DOE notes the commentor's concerns regarding the restart of any DOE reactor facility.

Commentor No. 7: Edie Bradley

Response to Commentor No. 7

Draft PEIS Comment Form

I still believe that Solar energy is a better choice!

7-1

7-1: DOE notes the commentor's interest in solar energy. The DOE missions to be addressed in this EIS, which include the production of medical and industrial isotopes, the production of plutonium-238, and civilian nuclear energy research and development, can currently only be met using nuclear reactor or accelerator technologies.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Edie Bradley

Organization: Edith's Tears

Home/Organization Address (circle one): _____

City: Haver Is State: WA Zip Code: 98070

Telephone (optional): 206-232-9728

E-mail (optional): _____

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Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

Commentor No. 8: John Ritter & Family

Draft PEIS Comment Form

July 29/2000

Please accept our family's
 sincere appreciation.

There is only 1 Alternative
#5 Phase permanently deactivate
FFTF with NO real
mission (1) clean-up

what has already been done at
Hanford. Please,

John Ritter and
Family

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional):  The Ritter Family

Organization: Hood River, OR 97031-9579

Home/Organization Address (circle one):

City: State: Zip Code:

Telephone (optional):

E-mail (optional):

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For more information contact: Collette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free telephone: 1-877-562-4593 • Toll-free fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

Response to Commentor No. 8

8-1

8-1: DOE notes the commentor's support for Alternative 5, Permanently Deactivate FFTF.

8-2

8-2: DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

Commentor No. 9: Charles Greer

Response to Commentor No. 9

Draft PEIS Comment Form

Continue deactivation of FFTF.
Continue clean-up at Hanford & INEL.
Continue removal of waste at INEL.

Preferred alternative is no. 2.
- Use only existing operational facilities.

Preferred option is no. 1 -
- Limits operations to 2 sites - Idaho & Tennessee
- Lessens risk due to transport or accident

Without cost factors this is just an exercise.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): _____

Organization: *****  ***** _____

Home/Organization  _____

City: _____ Zip Code: _____

Telephone (optional): _____

E-mail (optional): _____

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Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

- 9-1:** DOE notes the commentor's support for Alternative 5, Permanently Deactivate FFTF and support for Alternative 2, Use Only Existing Operational Facilities, Option 1, Irradiate at ATR and Process at REDC. It should be noted that deactivation of FFTF is a component of all options under Alternative 2 (as well as under Alternatives 3, and 4).
- 9-2:** DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.
- 9-3:** Implementation of the nuclear infrastructure alternatives described in Section 2.5 of Volume 1 would not impact schedules or funding for cleanup activities at Idaho National Engineering and Environmental Laboratory (INEEL). As discussed in Volume 1, Section 3.3.11.1 of the NI PEIS, cleanup activities at INEEL are coordinated with the Environmental Protection Agency and the State of Idaho under a consent order. DOE's objective is to achieve delisting from the National Priorities List by the Year 2019.
- Waste management at INEEL is described in Section 3.3.11 of the NI PEIS, and waste generation that would result from implementation of Alternatives 1 or 2 is described in Sections 4.3.2.1.13 and 4.4.2.1.13, respectively. Waste that would be generated at INEEL under Alternatives 1 or 2 would be small in comparison to onsite treatment, storage and disposal capacities.
- 9-4:** See response to comment 9-1.
- 9-5:** The costs of proposed actions are not required by NEPA and CEQ regulations to be included in a PEIS. DOE prepared a separate Cost Report to provide additional pertinent information to the Secretary of Energy so that he may make an informed decision with respect to the

Commentor No. 9: Charles Greer (Cont'd)

Response to Commentor No. 9

alternatives presented in the NI PEIS. Pursuant to CEQ regulations (40 CFR 1505.1(e)), agencies are encouraged to make ancillary decision documents available to the public before a decision is made. The associated cost report was made available to the public on August 24, 2000. DOE mailed this document to about 730 interested parties on August 24, 2000. The report was made available immediately upon release on the NE web site (<http://www.nuclear.gov>) and in the public reading rooms. DOE has also provided a summary of the Cost Report in Appendix P in the Final NI PEIS. The Record of Decision concerning enhancement of DOE's nuclear infrastructure is scheduled for January 2001.

Commentor No. 10: John M. Ryskamp

Response to Commentor No. 10

RUS 14 '00 01:40PM LMITCO/PEDL

P. 1

Draft PEIS Comment Form

I HAVE READ THE DRAFT PEIS DOE/EIS - 0310D.
I BELIEVE THAT ALTERNATIVE 1 - RESTART FFTF
OR ALTERNATIVE 2 - USE ONLY EXISTING OPERATIONAL
FACILITIES - ARE THE BEST COURSES OF ACTION
AT THE PRESENT.

HOWEVER, IN THE LONG TERM, I BELIEVE THAT
ALTERNATIVE 4 - CONSTRUCT A NEW RESEARCH
REACTOR - SHOULD BE PURSUED. THE DOE
NERAC HAS STATED IN SEVERAL PLACES THAT
A NEW RESEARCH REACTOR IS NEEDED, AND
I AGREE.

SO, START WITH ALTERNATIVE 1 OR 2, BUT GET
DOE TO BEGIN LONG-TERM DESIGN OF A NEW
DOE RESEARCH REACTOR.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): JOHN M. RYSKAMP

Organization: _____

Home Organization Address (circle one): 189 COMMONS RD.

City: IDAHO FALLS State: ID Zip Code: 83401

Telephone (optional): 208-528-6906

E-mail (optional): ryska@ida.net

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Collette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

7/12/00

10-1

10-1: DOE notes the commentor's support for either Alternative 1, Restart FFTF, or Alternative 2, Use Only Existing Operational Facilities, while Alternative 4, Construct New Research Reactor, is being pursued.

10-2

10-2: See response to comment 10-1.

10-3

10-3: See response to comment 10-1.

Response to Commentor No. 11

11-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

11-1

Please restart FFTF for medical isotopes. This is the most cost effective solution for isotope production.

Sincerely,
Laurie Gerber

Commentor No. 11: Laurie Gerber

Commentor No. 12: James Breed

Response to Commentor No. 12

Draft PEIS Comment Form

Since the FFTE is a research facility that will be useful when the U.S. returns to nuclear power and can be used now for making medical isotopes (admittedly at a loss), I feel it should be kept in operation. Shutting down destroys the facility and would require all new construction!

12-1

12-1: DOE notes the commentor's support for Alternative 1, Restart FFTE.

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- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): James BreedOrganization: retiredHome/Organization Address (circle one): 2184 Clairview AveCity: Richland State: WA Zip Code: 99352

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Cateille E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: NuclearInfrastructure-PDS@hq.doe.gov



7/12/00

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Commentor No. 13: Kalle H. Hyrkas

Draft PEIS Comment Form

I fully support the alternative of restarting the Fast Flux Test Facility.

13-1

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

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- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Kalle H. Hyrkas

Organization: Training

Home Organization Address (circle one): 500 Cottonwood Dr.

City: Richland State: WA Zip Code: 99352

Telephone (optional): (509) 372-0207

E-mail (optional): Kalle-H-Hyrkas@rl.gov

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

Response to Commentor No. 13

13-1: DOE notes the commentor's support for Alternative 1, Restart FFTE.

Commentor No. 14: Big Bend Economic Dev. Council

Response to Commentor No. 14

Draft PEIS Comment Form

WE SUPPORT ALTERNATIVE #1 RESTART FFTE AT WYANDOT

14-1

FOR NATIONAL SECURITY REASONS WE OPPOSE EXCLUSIVE ACQUISITION
OF Pu-238 FROM RUSSIA.

14-2

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): _____

Organization: Big Bend Economic Dev. Council

Home/Organization Address (circle one): 410 W. 3rd Ave. - Suite F

Moses Lake WA 98837

City: _____ State: _____ Zip Code: _____

Telephone (optional): _____

E-mail (optional): BBEDC@atnet.net

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Commentor No. 15: Richard E. Brandt

Draft PEIS Comment Form

I would like to see the FFTE restarted, especially for isotope production.

15-1

Response to Commentor No. 15

15-1: DOE notes the commentor's support for Alternative 1, Restart FFTE.

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

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- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): Richard E. Brandt

Organization: Westinghouse Hanford Co - Retired

Home Organization Address (circle one): 4212 Meadowsweet St.

City: Pasco, State: WA Zip Code: 99301

Telephone (optional): 509-545-1417

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Collette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

Commentor No. 16: Doug Arbogast

Response to Commentor No. 16

Draft PLIS Comment Form

FFTF is a test reactor. It needs more missions to allow manufacturing of medical isotopes. Test logs of new kinds of fuel for other reactors.

It is a low-pressure type of reactor compared to water types. It produces a lot of heat that could be captured in turbines to generate power for parts of the Hanford area. It is to be said that the portion of a mission was changed some years back.

Why waste more money on keeping it in constant-burn. Give it a project and put her to work. That can build more jobs as well.

I, (your name here), am in favor of restarting the Fast Flux Test Facility (FFTF) for the production of medical isotopes.

(your signature here) Doug Arbogast

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- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): Doug Arbogast

Organization: Hanford Calibration Lab

Home/Organization Address (circle one): NE-80

City: Richland State: WA Zip Code: 99352

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Collette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free telephone: 1-877-562-4593 • Toll-free fax: 1-877-562-4592
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov

7/12/00

16-1

16-1: DOE notes the commentor's support for Alternative 1, Restart FFTF. It should be noted that power production is not one of the missions for which FFTF would be restarted.

Commentor No. 17: William E. Callaway

Draft PEIS Comment Form

FFTF needs a mission, its time to give it one.

I, Bill Callaway
(your name here), am in favor of restarting the Fast Flux Test Facility (FFTF)
for the production of medical isotopes.

W. Callaway
(your signature here)

17-1

Response to Commentor No. 17

17-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): William E. Callaway

Organization: Tax Payer

Home/Organization Address (circle one): 1524 Naches CT.

City: Richland State: WA Zip Code: 99352

Telephone (optional): (509) 627-4863

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Collette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

Commentor No. 18: Barbara & Vern Mobley**Response to Commentor No. 18**

Aug. 5, 00
 Ms. Colette E. Brown:
 We want F.F.T.F. running, we need
 the medical isotopes it can produce
 for Cancer Cure. Our family has lived
 in the Tri Cities for thirty six years
 and our son is employed at F.F.T.F.
 Keep it running!
 Barbara & Vern Mobley
 1731 W. Hopkins
 Pasco, Wa. 99301

18-1**18-1:** DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 19: Don C. Brunell
Association of Washington Business



Washington state's
chamber of commerce

Association of Washington Business

Don C. Brunell
President

August 10, 2000

Colette E. Brown, NE-50
U.S. Department of Energy
19901 Germantown Road
Germantown, MD 20874

Dear Ms. Brown:

As Washington's oldest and largest statewide business organization whose 3,700 members employ more than 600,000 people, we are writing this letter to express our continued support for the on-going environmental review process initiated by the Department of Energy for the Fast Flux Test Facility (FFTF) on the Hanford Nuclear Reservation. We believe that the Department must continue the process leading to the bringing on line of the FFTF for medical isotope research and treatment.

It is obvious that there is a need for additional sources of medical isotopes for research and treatment. The benefits of these isotopes to the patients are numerous. They include improved efficacy, reduced cost, and a significantly improved quality of life while undergoing treatment. The citizens of the Pacific Northwest are blessed with one of the best health care provider and research networks in the world. Having isotopes readily available for our health care industry stands to improve the quality of care for our residents and those in other parts of the world.

We have additional concerns which we believe should be surfaced in the on-going environmental review process. With the very recent national electrical energy shortages coupled with concerns about global warming, there is a need for additional nuclear energy-based research. Given the concerns about carbon monoxide emissions from fossil-fuel generating facilities and the fact that existing non-fossil fuel, non-nuclear technologies, and conservation are not able to fill the gap; research to find acceptable solutions to the issues facing nuclear power production is necessary. If we are to have sufficient electricity to power our computers, heat and cool our homes and operate our facilities, nuclear power must be explored as an option for the future. At the very least,

We keep Washington working

P.O. Box 658 ■ 1414 Cherry Street Southeast ■ Olympia, Washington ■ 98507-0658 ■ www.awb.org
360.943.1600 ■ Toll-free: 1.800.521.9325 ■ fax 360.943.5811 ■ E-mail: DonB@awb.org

Response to Commentor No. 19

19-1

19-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 19: Don C. Brunell (Cont'd)
Association of Washington Business

Page 2
 Collette E. Brown Letter
 August 10, 2000

this proven source of energy production should be re-examined.

As one who represents a diversity of businesses from our state's major corporations to very small shop owners, decisions must be made based on a sound cost-benefit analysis, ability to meet anticipated market needs and overall risk. Clearly, the Fast Flux Test Facility (FFTF) represents the lowest risk, since it is an existing facility where the medical isotope activities have already been performed. It also appears that the FFTF provides greater flexibility to meet the multiple missions identified in the EIS, whereas the other alternatives appear to be dedicated to a single purpose with limited growth potential.

We hope the Department will proceed expeditiously with the environment review and we would certainly hope it would lead to the safe and efficient restart and operation of the FFTF.

Thank you and if you need additional information, please let us know.

Sincerely,


Don C. Brunell
 President

Cc: Governor Gary Locke
 Senator Slade Gorton
 Senator Patty Murray
 Congressman Richard Hastings

19-1
(Cont'd)

Response to Commentor No. 19

Commentor No. 20: Clyde Nash, Jr.

Draft PEIS Comment Form

IMPORTANT CONCERNS TO PUBLIC HEALTH AND SAFETY CODE MINIMIZING THE POTENTIAL RELEASE HAZARDOUS SUBSTANCES FROM THE K-BASIN BY REMOVING THE SPENT NUCLEAR FUEL, SLUDGE, DEBRIS, AND WATER. THE MATERIAL WILL BE TAKEN TO HANFORD CENTRAL PLANT FOR TREATMENT, STORAGE, AND FOR DISPOSAL.

20-1

HANFORD'S CLEANUP MISSION, AND FURTHER STATED THAT OPERATION OF FETC COULD HELP SAVE THE LIVES OF MANY PEOPLE BY PRODUCING ISOTOPES TO BE USED IN NEW WAYS TO TREAT CANCER, HEART DISEASE, AND OTHER ILLNESSES.

20-2

COMMENTORS WERE ALSO CONCERNED ABOUT THE POTENTIAL GENERATION OF RADIOACTIVE AND HAZARDOUS WASTE AS A RESULT OF THE PROPOSED MISSIONS, AS WELL AS DOE'S COMMITMENT TO ONGOING CLEANUP PROGRAMS, PARTICULARLY AT HANFORD.

20-3

20-1

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- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): CLYDE NASH JR

Organization: _____

Home/Organization Address (circle one): _____

719 SOUTH THORSON AVENUE

City: COMPTON, State: CA Zip Code: 90221

Telephone (optional): 1-310-637-1216

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

Response to Commentor No. 20

- 20-1: DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although disposition of K-Basin spent nuclear fuel is beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.
- 20-2: DOE notes the commentor's support for Alternative 1, Restart FFTF and for the Hanford cleanup mission.
- 20-3: DOE notes the commentor's concern about waste generation. The NI PEIS addressed the environmental impacts due to the treatment, storage and disposal of the waste generated by the proposed actions for all alternatives and alternative options. Waste minimization programs at each of the proposed sites are also addressed. These programs will be implemented for the alternative selected in the Record of Decision. The waste generated from any of the proposed alternatives in the NI PEIS will be managed (i.e., treated, stored and disposed) in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws and regulations and applicable DOE orders.

Commentor No. 21: Bernice C. Mitchell

August 2, 2000

Mr. John Geehofer, Professional Programming
Washington State Medical Association
20336th Avenue, Suite 1100
Seattle, Washington 98121

DOE Secretary Richardson
Attn(s): NNSA Administrator
7B048 – NA-1, --- Director:
Carol M. Borgstrom (EH-42)
Office of NEPA Policy & Assist.
and Mr. William D. Magwood, IV, ✓
Director, Office of Nuclear Energy,
Science and Technology, all at
1000 Independence Ave. SW
Washington, DC 20585

Mr. Ron Rabun, Richland City Manager
P. O. Box 190
Richland, WA 99352

DOE/RL Director Kline
Attn: Mike Talbert, A7-75
Richland, WA 99352

Governor Gary Locke
P. O. Box 40002
Olympia, WA 98504

Mr. William Martin, TRIDEC
901 North Colorado Street
Kennewick, WA 99336

Colette E. Brown, Document Manager ✓
Office of Space and Defense Power Systems (NE-50).
Office of Nuclear Energy, Science and Technology.
U.S. Department of Energy
19901 Germantown Road
Germantown, MD 20874
Attention: NI PEIS
Telephone: (877) 562-4593
E-mail: Nuclear Infrastructure-PEIS @hq.doc.gov

Greetings to Mr. Geehofer, et al. This is a Memo of Understanding to each of you, a follow-up, promised to the Washington State Medical Association—about the DOE/EIS-0319D, JULY 2000 “DRAFT Programmatic Environmental Impact Statement for Accomplishing Expanded Civilian Nuclear Energy Research and Development and Isotope Production Missions in the United States,” and my asking their Washington State Medical Association to be the Civilian benefactor and Partner in/of FFTF’s RESTART AND OPERATION. Mr. Mike Talbert of DOE/RL made available to me “posthaste,” at my 8/2/00, request, to send to you and yours, DOE’S related Volumes 1 and 2 and DOE’s Summary Copy of both Volumes, that you may be informed concerning my request, and that you may inform others of the Washington State Medical Association’s Program Office to allow them to get a better understanding of DOE’s Role in/of the Fast Flux Test Facility (FFTF), and any DOE Mission Statements and responsibilities to our Medical World, concerning DOE Secretary Richardson, the U.S. Department of Energy’s Energy and Natural Resources’ Zaar, DOE’S RESPONSIBILITY FOR ENSURING THE AVAILABILITY OF ISOTOPIES FOR MEDICAL APPLICATION, ETC., as a follow-up to my informing your Office of my April 2000 letter to DOE’S Mr. William D. Magwood, IV, Director of DOE’s Office of Nuclear Energy, Science and Technology, requesting that DOE give FFTF to Washington State Doctors, namely: one and the same, who will be/are prime users of medical isotopes: in the same fashion DOE gave the Port of Benton to Benton County, to allow the doctors, NASA and/or DOE, or other Federal, or private entities to partner with the doctors to use whatever “fall-out” that will be generated in the production of isotopes... such as Pu-238 used by NASA, etc., keeping DOE’s presence AND Federal Dollars at Hanford. I thought was the most important “fall-out” until I received a copy of the PEIS DRAFT. The first paragraph of its Summary stating that ensuring the availability of isotopes for medical, industrial, and ensuring

Response to Commentor No. 21

- 21-1:** Although other private manufacturers produce medical radioisotopes, DOE remains the key provider for a large number of radioisotopes that are used in relatively small quantities by individual researchers at universities and hospitals. Because their application is initially experimental, these isotopes are not generally purchased in large-enough quantities to make their production financially attractive to private industry. Under the NI PEIS proposed action and consistent with its mandates under the Atomic Energy Act, DOE would enhance its existing nuclear facility infrastructure to, among other things, more effectively support production of radioisotopes for medical applications and research. DOE’s intent is to complement commercial sector capabilities to ensure that a reliable supply of isotopes is available in the United States to meet future demands, and encourage the commercial sector to privatize the production of isotopes that have established applications to a level that would support commercial ventures.

The United States government believes that reasonable business relationships with Russia are important. If the purchase of plutonium-238 from the Russians becomes unnecessary, then no new contracts will be negotiated.

21-1

Commentor No. 21: Bernice C. Mitchell (Cont'd)

RESEARCH APPLICATIONS, AND UNDERTAKING RESEARCH AND DEVELOPMENT ACTIVITIES RELATED TO DEVELOPMENT OF NUCLEAR POWER FOR CIVILIAN USE; INDICATES THAT DOE NEEDS FFTF RESTARTED ASAP. DOE ALREADY APPEARS CRIMINALLY NEGLIGENT PER THE Atomic Energy Act of 1954, as amended. DOE should be begging the Washington Medical Association to partner with them, instead of my begging either, and they both should be seeking out each other, asking the above local, State and Federal people to help them, to help this materialize. Mr. Richardson signed a Congressional Contract and the members of the Medical Associations took the Hippocratic Oath. DOE and the Medical Associations are positioning the Local, State and National Economy and National Well-Being toward demise, while they force the Medical Associations and Federal Agencies to import medical and industrial isotopes, thereby building foreign economies—letting us ingest their "nuclear fall-out," while we keep FFTF in "deactivated status" at the cost of millions of dollars, in fear that we will ingest some of our own "nuclear fall-out," by having delayed and are still refusing to bring FFTF "ON LINE." (Nuclear fall-out is of no respect of persons or place, somewhat different than people. Those foreign (Russian, et al) millionaires we are creating by importing their ISOTOPES will some day own the U.S.A. when our Economy sinks to "third world" status.... There was a recent World War II Update that stated the babies, fathered by American Soldiers, left overseas when the War Ended, were placed in insane asylums and not orphanages). FFTF COULD HAVE BEEN AND COULD BE PRODUCING THE ISOTOPES AND BUILDING THE COMMUNITY'S AND U.S.A.'s ECONOMY THROUGH THE NUMBER OF JOBS/EMPLOYEES WILL BE NEEDED TO OPERATE FFTF.

Mr. Rabun, thank you for considering to assemble Mr. Martin of TRIDEC, DOE/Mr. Talbert and Governor Locke to meet with the Medical Association concerning a DOE/WSMA EXPLORATION OF THE REACTIVATION OF FFTF WITHIN THE ABOVE PREFERENTIALS. POSTHASTE—ATLEAST A MEETING OF THESE MINDS!!

ATTENTION MS. COLETTE E. BROWN, DOCUMENT MANAGER OF THE OFFICE OF SPACE AND DEFENSE POWER SYSTEMS (NE-50), OFFICE OF NUCLEAR ENERGY, SCIENCE AND TECHNOLOGY, U.S. DEPARTMENT OF ENERGY, ATTENTION: NIPES; AND MR. WILLIAM D. MAGWOOD, IV, DIRECTOR OF THE OFFICE OF NUCLEAR ENERGY, SCIENCE AND TECHNOLOGY; PLEASE ACCEPT YOUR COPIES OF THIS MEMO AS MY AUGUST 31, 6:00PM RICHLAND, WA, BEST WESTERN TOWER INN'S "PUBLIC MEETING REGISTRATION AND THE MEETING'S WRITTEN, PUBLIC COMMENT, AND A PART OF THE PERMANENT PUBLIC COMMENT FILE, WITH THE FOLLOWING ADDITION: "I WANT THE RESTARTING OF THE FAST FLUX TEST FACILITY THAT IS CURRENTLY IN STANDBY STATUS, INCLUDING, ELEVATING IT TO THE CAPABILITY OF PRODUCING BOTH MEDICAL AND INDUSTRIAL ISOTOPES, AND Pu-238 SUFFICIENT FOR ALL U.S. NEEDS, WITH MY ABOVE SUGGESTED PARTNERSHIPS; AND THE EARLY CANCELLATION OF ALL Pu-238 AND ISOTOPE PURCHASING CONTRACTS WITH RUSSIA; AND OTHERS, INCLUDING THE YEARLY \$155 MILLION DOLLARS MENTIONED IN THE TRI-CITY HERALD, THAT DOE IS FUNNELING THROUGH PNNL, TO RUSSIA AS SECURITY'S FUNDS; AND USE THESE FUNDS AND THE Pu-238 RUSSIAN CONTRACTUAL FUNDS; AND SUFFICIENT—NEW CONGRESSIONAL FUNDING, TO DEFRAY THE COST OF REACTIVATING AND UPGRADING FFTF "POST HASTE" " Thanks to all of you in advance!!

Yours truly

Bernice C. Mitchell
Bernice Castleberry Mitchell
115 Spring Street
Richland, WA 99352
Phone: (509) 375-0373

Enclosures: 1) July 21, 2000 DOE Coverletter showing Draft PEIS Hearing Schedule (August 22, 2000 through September 6, 2000).
(J. Gechofer) 2) Draft PEIS Comment form.

21-1
(Cont'd)

21-2

21-1

Response to Commentor No. 21

21-2: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 21: Bernice C. Mitchell (Cont'd)

- 3) Draft (Summary) Programmatic Environmental Impact Statement for Accomplishing Expanded Civilian Nuclear Energy Research and Development and Isotope Production Missions in the United States, Including the Role of the Fast Flux Test Facility, and Volumes 1 and 2.

CC: Gary King, Ph.D., J.D.
Director, Office of Worker
And Community Transition
Department of Energy
Washington, DC 20585

DOE Office of Inspector General
Department of Energy
Washington, DC 20585

Mr. Frank C. Morales
Consultant/Investigator
Morales & Associates
Specialists in Federal Government
Third Party Investigations
1211 Maricopa Hwy, Suite 202
Ojai, CA 93023
f.morales@worldnet.att.net

*Note: I received my PEIS draft direct from
returning my comment direct !!!
Bernice C. Mitchell*

Page 3 of 3

Response to Commentor No. 21

Commentor No. 22: Richard E. Schreiber

Draft PEIS Comment Form

Please see enclosed.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

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- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): Richard E. Schreiber
 Organization: retired from Oak Ridge National Lab.
 (Home) Organization Address (circle one): 951 West Outer Drive

City: Oak Ridge State: TN Zip Code: 37830-8606

Telephone (optional): 565-482-2379

E-mail (optional): Dickschreiber@worldnet.att.net

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Catherline E. Brown, NE-50
 U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
 Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
 E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

Response to Commentor No. 22

Commentor No. 22: Richard E. Schreiber (Cont'd)

951 West Outer Drive
Oak Ridge, TN 37830-8606
August 8, 2000

Colette E. Brown, NE-50
U.S. Department of Energy
19901 Germantown Road
Germantown, MD 20874

Dear Ms. Brown:

Please consider my comments on the proposed EIS for expansion of the Nuclear Energy R/D and Isotope Missions of the USDOE. I am now retired, but for several years I was in charge of the Iridium Project at the Oak Ridge National Laboratory. The radioactive iridium was produced in the High Flux Isotope Reactor (HFIR), packaged and shipped to commercial suppliers of gamma ray sources for radiographing welds in industry.

I am supportive of the production of Pu-238 as a heat source for NASA deep space missions and favor the restart of FFTF and the construction of a new research reactor. I am opposed to the use of the HFIR for Pu-238 production because it would involve cannibalizing facilities now used for iridium irradiation, as well as the manufacture of other radioisotopes.

The biggest problem with the production of any radioisotope is reliability of source. If there is any threat to that source, customers go elsewhere. This will be true for Pu-238, just as it is for iridium now. There are just two sources of radioactive iridium in the United States and both are dependent on the uninterrupted operation of two reactors, HFIR and ATR. Both are ancient machines and subject to frequent unscheduled shutdown. Modernization efforts are modest and the pressure-containing members are subject to radiation degradation and must be retired from service in the near term. This uncertainty in the production of iridium gamma sources in the U.S. has led many customers to choose Russia as their supplier. The same will be true for Pu-238 if the proposed program does not go forward.

Ideally, the development of another research reactor and the restart of FFTF would assure the uninterrupted production of all radioisotopes needed in civilian programs in this country.

I believe three other points need to be made with regard to the scope of the present and proposed programs in the NI PEIS.

22-1

22-2

22-3

22-2

22-1

Response to Commentor No. 22

22-1: DOE notes the commentor's support for Alternative 1, Restart FFTF, in combination with Alternative 4, Construct New Research Reactor. Based on the alternatives presented in the NI PEIS, the Record of Decision can implement one or more alternatives, or a combination of elements from one or more alternatives.

22-2: See response to comment 22-1.

22-3: The use of HFIR for plutonium-238 production would not involve cannibalizing facilities now used for iridium irradiation and would not impact current missions. As stated in the NI PEIS, Section 2.5.3 of Volume 1, "Depending on the combination of facilities used in Alternative 2, HFIR and ATR could continue their current support of the medical and industrial isotope and research and development missions, including some near-term growth, while accommodating the production of plutonium-238."

DOE agrees with the commentor's concern about the reliability of the current sources of radioisotopes. This PEIS is a necessary step in the process of expanding isotope production in the United States.

22-4: Current domestic and global producers of radioisotopes include governments that operate reactors and accelerators at national laboratories or institutes, and private sector companies that own and operate accelerators. There are also many partnership arrangements wherein companies lease irradiation space in government reactors or operate processing facilities in coordination with the government. A

Commentor No. 22: Richard E. Schreiber (Cont'd)

C.E. Brown

Page 2

- (1) The document makes no mention of how the government isotope program fits into the total isotope production and use in this country, and the world. There are many more isotopes used, and greater quantities (curies), that are produced in accelerators than in government reactors. Some materials are produced in university reactors and some of the dominant isotopes used in medicine are derived from sources provided by Canada. Some European countries other than Russia also provide isotopes that compete with USDOE sources. It would be useful if the PEIS examined in some detail just how the DOE program shares in the overall radioisotope economy. Those parts that compete and those parts that are unique should be highlighted.
- (2) The iridium program, and other radioisotope programs as well, could greatly benefit from expanded use of the calutrons at Oak Ridge (Y-12). These devices are used to separate naturally occurring mixtures of isotopes. At present, it is necessary to allow the iridium sources to cool after irradiation to reduce the amount of high energy gammas coming from an undesired isotope which decays faster than the lower energy, desired isotope. The time lost reduces the service longevity of the sources. Separation of the isotopes prior to irradiation would solve this problem and reduce handling difficulties, as well. The same concept applies to many other radioactive sources that have many (non-radioactive) isotopes occurring together in nature.
- (3) Radio- and non-radioisotopes are largely sold to commercial users, or provided to researchers with government grants. The income from commercial users should be retained by the DOE facility making the sale, instead of being sent to the US Treasury. Normal commercial incentives, and the flexibility to use income for development purposes, should be available to the local DOE laboratory or other facility that actually makes the transaction. This would not only be a spark plug for the operation, stimulating efficiencies and morale, but would also make visible the income-producing capability of the program. This visibility would be helpful when seeking funding from Congress, funding which would still be necessary because of the large infrastructure costs associated with reactor and hot cell operation. The same concept applies for calutron and accelerator-produced isotopes. Seeing the contribution and social need for these materials would give greater public and Congressional support.

I believe it would be of great benefit to the argument presented in the PEIS if these points are included.

Sincerely,



Richard E. Schreiber

Response to Commentor No. 22

few universities also produce radioisotopes, but their ability to provide reliable and diverse supplies are generally limited by the small-scale capabilities or operating schedules of their facilities.

DOE's production and sale of radioisotopes fall into two categories—"commercial" and "research" and both types of isotope production are considered under the proposed actions. Commercial radioisotopes are those that are produced in large, bulk quantities and sold to pharmaceutical companies or distributors, or to equipment or sealed source manufacturers. Examples of commercial radioisotopes produced by DOE include strontium-82 and germanium-68 for medical applications, and iridium-192 and californium-252 for industrial applications. DOE only produces commercial isotopes when there is no U.S. private sector capability or when foreign sources do not have the capacity to meet U.S. needs reliably. In contrast, research radioisotopes are typically produced and sold in small quantities in response to specialty orders from researchers preparing experiments in the field of medicine, with small quantities of these radioisotopes also purchased by industrial researchers. Because small-quantity production of research isotopes is not financially attractive to private-sector producers and is generally not undertaken, DOE attempts to provide all research radioisotopes that are requested, subject to production capability, inventory, and financial constraints. As successful application of a specific research isotope is established, the production and sales of that radioisotope may shift from research to commercial status. In recent years, over 95 percent of DOE's sales of radioisotopes by dollar volume were commercial and 5 percent have been for research. Additional discussion of how DOE's isotope program fits into the overall U.S. and foreign isotope production capabilities was incorporated into Section 1.2.1 of Volume 1.

- 22-5:** Separation of naturally occurring isotopes using the Oak Ridge calutrons is not within the scope of the NI PEIS. However, nothing in this PEIS would prevent their use to purify isotopes prior to irradiation if DOE deemed such use to be beneficial.
- 22-6:** DOE notes the commentor's ideas about income allocation. DOE has not ruled out shared-income approaches related to future operation of isotope production facilities.

Commentor No. 23: Eugene C. Koschik

U. S. Department of Energy, Office of Space and Defense Power Systems, NE-50
19901 Germantown Road
Germantown, Maryland 20874-1290

Dear Mr. Secretary,

I help build FFTF while an employee of Westinghouse Hanford Company starting in 1971.

During 1980, FFTF achieved power status.

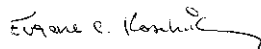
It only operated a few years and then was on "standby status" - WHAT A WASTE!

My wife had colon cancer surgery last year and did not require chemo or radiation.

However, the future is very uncertain regarding necessary treatments?

PLEASE RESTART FFTF FOR MEDICAL ISOTOPIES.....

Thanks.



Eugene C Koschik
121 W. 31st
Kennewick, WA 99337

|| 23-1

Response to Commentor No. 23

23-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 24: Barbara Poulson

Aug 21 00 10:08a

Barbara Coviello

509-234-0445

p.1

Draft PEIS Comment Form

I wish to show my support for Alt 1
 There is a growing need for medical &
 industrial isotopes and a need to support
 future NASA space missions. To be involved
 in civilian nuclear energy research
 is highly desirable, especially for Washington
 state & will keep our area highly employable.
 The first flux test facility is an excellent
 way to expand our knowledge on many areas

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): Barbara Poulson

Organization: _____

Home/Organization Address (circle one): 6290 WSR 260City: Corvallis State: OR Zip Code: 97331

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Coviello E. Brown, NE-50
 U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
 Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
 E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

Response to Commentor No. 24

24-1

24-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 25: Elizabeth Miles

8/13/00

Ms. Collette Brown

NE-50

USDOE

19901 Germantown Rd.

Germantown, MD 20874

Dear Ms. Brown:

I am outraged that the DOE
is considering firing up the
experimental reactor at Hanford.

No! This area is already
contaminated with radioactive
waste which cannot be fully
contained. We do not need more
space fuel and weapons processing.

No! Do not use my tax
dollars for this dangerous project.

Thank you.

Elizabeth Miles

Elizabeth Miles 138

800 NE Roberts #

Gresham OR 97030

Response to Commentor No. 25

25-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF. The commentor should be aware that FFTF is not an experimental reactor, but rather was built to test fuel for the breeder reactor program.

25-2: DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing activities to remediate existing contamination at Hanford are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement. The missions delineated in the NI PEIS would not have an impact on Hanford cleanup activities.

Current waste management activities are conducted in accordance with applicable Federal and state laws and regulations and appropriate DOE orders.

25-3: The purpose of the NI PEIS is to evaluate the environmental impacts of a range of reasonable alternatives to fulfill the proposed action, one of which is the domestic production of plutonium-238. Plutonium-238, used to support NASA space missions, is not weapons-grade plutonium (i.e., plutonium-239), and no defense missions or weapons processing activities are associated with the proposed action. Section 1.2.2 of Volume 1 was revised to clarify the purpose and need for reestablishing a domestic plutonium-238 production capability to support NASA space exploration missions.

25-4: DOE notes the commentor's opinion.

Commentor No. 26: George T. Dvorak

Draft PEIS Comment Form

I support the restart of FFTE for use in the production of tritium and medical isotopes.

26-1

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): GEORGE T. DVORAK

Organization: _____

Home ☒ Organization Address (circle one): _____

58411 N. DEMOSS RD

City: BENTON CITY State: WA Zip Code: 99020

Telephone (optional): 1-509-588-5725

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

Response to Commentor No. 26

- 26-1: DOE notes the commentor's support for Alternative 1, Restart FFTE. The production of tritium or any other defense-related mission are not within the scope of actions proposed for FFTE in this NI PEIS.

Commentor No. 27: Craig A. Maydole

Response to Commentor No. 27

Draft PEIS Comment Form

After fully reviewing the Draft PEIS I have concluded that the best possible action would be a restart of the FFTE for the production of medical isotopes, PP-238, and nuclear research. I feel that further delaying the restart of the FFTE is a waste of my tax dollars. Further, delaying the restart of FFTE places undue risk on my life by delaying valuable research time to a cure for cancer and other diseases. Additionally delaying a restart of the FFTE places the US. at risk by forcing us to become dependant on foreign sources of radioisotopes. I urge the Secretary to order the immediate restart of FFTE.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): Craig A. Maydole

Organization: Private citizen

Home/Organization Address (circle one): 3720 Lexington Ave

City: West Richmond State: WA Zip Code: 99353

Telephone (optional): _____

E-mail (optional): ca35@excite.com

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

27-1

27-1: DOE notes the commentor's support for Alternative 1, Restart FFTE.

Commentor No. 28: Barry Egner

1639 SW Skyline Blvd.
Portland, OR 97211
August 11, 2000

Collette E. Brown
NE-50
U.S. Department of Energy
19901 Germantown Rd.
Germantown, MD 20874

Dear Ms. Brown,

Enclosed with the letter is a copy of a letter that I sent (twice!) before, dated as indicated, to which I received no reply.


I understand that the Department is considering restarting the reactor at Hanford. In 1994 Secretary O'Leary said that the Hanford reservation would never make nuclear material again, that its sole activity would be repairing the damage already done.

So aside from the further detriment to credibility that the reconsideration of this decision creates, what am I to make of current proposals?

I can only conclude that I do not trust those managing the Hanford reservation to be cautious or truthful.

I strongly urge Secretary Richardson to resist any consideration to reopen the reactor at Hanford.

Yours truly,


Barry Egner MD

28-1

28-2

Response to Commentor No. 28

- 28-1:** DOE was tasked by Congress in the Atomic Energy Act of 1954, as amended, to "ensure the availability of isotopes for medical, industrial, and research applications, meeting the nuclear material needs of other federal agencies, and undertaking research and development of activities related to development of nuclear power for civilian use." The purpose of this PEIS is to determine the environmental and other impacts to accomplishing this mission from all reasonable existing and new DOE resources. The FFTF at the Hanford Site was one of several existing DOE resources that was assessed for this mission.

DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

The prior Secretary's statement pertained to nuclear weapon materials. No weapons material will be produced within the stated mission. All stated missions are for civilian purposes.

- 28-2:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

Commentor No. 28: Barry Egner (Cont'd)

July 18, 1997
1639 SW Skyline Blvd.
Portland, OR 97221

Department of Energy
Washington DC

To Whom It May Concern:

This letter is in regard to the May, 1997 explosion at Hanford in Washington.

As an American citizen and as a resident of the NW, I am concerned about the incompetence and (lack of) credibility of those managing this hazardous facility.

Since your office and the contractors have already established that information you provide to the public is not trustworthy, I am not interested in receiving reassurances about procedures or planned corrections. We've been there before.

Instead, this letter is a request for an address where I can write to follow subsequent actions that are taken in regard to the management of the facility. Preferably, this would be a public watchdog organization or a federal office outside of your own.

Thank-you.

Barry Egner MD

cc: Ron Wyden, US Senator

28-3

Response to Commentor No. 28

28-3: DOE notes the commentor's concern about continued safe operations at the Hanford site. For a specific response to the concerns over the May, 1997 tank explosion at the Plutonium Reclamation Facility, please refer to the Comment Response, ORD 07-16, p. 3-417, included in the Surplus Plutonium Disposition FEIS, Volume 3.

For a general oversight of Hanford cleanup operations, there are two information sources.

1. The Defense Nuclear Facilities Safety Board (Attention: Andrew L. Thibadeau, Post Office Box 7887, Washington, D.C. 20044-7887, 1-800-788-4016, mailbox@dnfsb.gov; URL: <http://www.dnfsb.gov/>) is responsible for independent, external, nuclear health and safety oversight of all activities in DOE's nuclear weapons complex. The Board reviews operations, practices, and occurrences at DOE's defense nuclear facilities and makes recommendations to the Secretary of Energy that are necessary to protect public health and safety. Activities that would occur under the nuclear infrastructure alternatives (described in Section 2.5 of Volume 1) are unrelated to the national defense. Neither nuclear weapons nor components for nuclear weapons would be produced under these alternatives (See Section 1.2 of Volume 1 for a description of the nuclear infrastructure missions).

2. The Hanford Advisory Board (Hanford_Advisory_Board@rl.gov; URL: <http://www.hanford.gov/boards/hab/charter/charter.htm>) may also be of interest. It is an independent, oversight body consisting of a balanced mix of the diverse interests that are affected by Hanford cleanup issues. Its mission is to provide informed recommendations and advice to the DOE's Richland Operations Office, the U.S. Environmental Protection Agency, and the State of Washington Department of Ecology -- the Tri-Party agencies -- on selected major policy issues related to the cleanup of the Hanford site.

Commentor No. 29: Anonymous

For your information
In my opinion, this
distorts the benefit
of having public
meetings. ADIS is
trying to dominate
the hearings.

29-1

Response to Commentor No. 29

29-1: DOE notes the commentor's concern that the public hearings are susceptible to domination by individual groups. In addition to the public hearings, comments could be submitted by various means including mail, a toll-free telephone and fax line, and a web site (<http://www.nuclear.gov>). The public hearing format used was based on stakeholder input and was presented in the Notice of Availability (65 FR 46443 et seq.) for the Draft NI PEIS. This format was intended to encourage public discussion, regardless of the motivation for attending the hearing. It provided an opportunity for the participants to meet one another, exchange information, and share concerns, with DOE personnel available throughout the course of each hearing to answer questions. The meetings were facilitated so as to ensure that all persons wishing to speak had an opportunity to do so. Persons wishing to comment were selected at random from the audiences rather than according to the order in which they registered. This was accomplished by a random number drawing. In addition to the comment recorder stationed at the main hearing, a second recorder was available in an adjacent room to receive comments without the need to await selection at the main proceeding. The hearing format used promoted open and equal representation by all individuals and groups. Equal consideration was given to all comments, regardless of how or where they were received.

Commentor No. 29: Anonymous (Cont'd)

Response to Commentor No. 29

A Call To Action!!!

The FFTF EIS Hearings are COMING!!!

August 28, Hood River, Or.
August 29, Portland, Or.
August 30, Seattle
August 31, Richland

All hearings are scheduled for 6:00 p.m. to 9:00 p.m.
Hood River hearing is at Hood River Inn, 1108 E. Marina Way.
Portland hearing is at Oregon Museum of Science & Industry (OMSI), 1945 SE Water Ave.
Seattle Hearing is at Wa. State Convention & Trade Center, 800 convention Place.
Richland hearing is at Tower Inn, 1515 George Washington Way.

These hearings are pivotal to the future of the FFTF!!
We have been told that public input will be a factor in
the final decision. Everyone who has an interest in
FFTF, please attend as many of these hearings as you
possibly can!! This may well be the make-or-break point
in the FFTF campaign. There has already been reaction to
the draft EIS. Do NOT let others dominate the
discussion! Get with your friends, co-workers and
neighbors and carpool. If you need transportation,
please call 946-6965 and leave a message.

It is also important that written comments be sent to:

Ms. Colerte Brown
DOE Office of Space & Defense Power Systems, NE-50
19901 Germantown Road
Germantown, Md. 20874-1290

.....or E-mail them to: Nuclear.Infrastructure-PEIS@hq.doe.gov
By September 18.

Commentor No. 30: Dianne Cooper

From: MDCOOPER2@aol.com%internet[SMTP:MDCOOPER2@AOL.COM]
 Sent: Monday, August 21, 2000 12:10:14 AM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: PEIS comment
 Auto forwarded by a Rule

To Ms. Colette Brown
 U.S. Department of Energy
 Office of Space and Defense Power Systems
 NE _ 50
 19901 Germantown Road, Germantown, MD 20874_1290

Ms. Brown

This letter is to express my comments on the draft PEIS for accomplishing expanded civilian nuclear energy research and development and isotope production missions in the United States, including the role of the Fast Flux Test Facility.

I support option #1. Restart of the FFTF at Hanford, Washington, to meet all isotope production and research requirements.

Believe the FFTF is a valuable asset that should be utilized. It makes economic sense to use the FFTF since it is already constructed, had an outstanding operating history, and has fuel available for these missions. Here in San Diego, California we are experiencing electrical rate hikes due to deregulation and not enough generation capacity, therefore isotopes should not be made in other reactors, which could take away needed space for fuel and reduce generation capacity. Medical isotopes will be needed in quantities (after medical trial experimental quantities are used) for distribution that only a large reactor like FFTF can provide.

Construction of one or two accelerators would take years to license and would only be another drain on the already stretched power generation capacity of the United States.

Construction of a new research reactor is not required when FFTF is already there and fully capable to meet this need. The legal challenges to build a new reactor are also very big and a new reactor could not be constructed in less than ten years and at great expense in these times.

Again I want to express support for the restart of the FFTF.

Thank you very much

Dianne Cooper

30-1

30-2

30-3

30-1

Response to Commentor No. 30

30-1: DOE notes the commentor's support for Alternative 1, Restart FFTF, and opposition to Alternative 3, Construct New Accelerator(s) and Alternative 4, Construct New Research Reactor.

30-2: See response to comment 30-1.

30-3: See response to comment 30-1.

Commentor No. 31: Alan E. Waltar
Texas A&M University

From: Alan E. Waltar[SMTP:WALTAR@NE.TAMU.EDU]
 Sent: Sunday, August 20, 2000 6:01:02 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: FFTF Restart
 Auto forwarded by a Rule

Dear Leaders of the Next Millennium,

It will not be physically possible for me to attend any of the upcoming public hearings associated with the FFTF EIS. Hence, please permit me to record my support for the restart for the FFTF in the strongest possible language!

I had the great privilege of working on the FFTF for a large part of my professional career. As such, critics may say that such an association clearly biases my support—somewhat akin to a father who would protect his son to the bitter end. If someone were to use such an analogy to dismiss my testimony, I would readily accept the charge. To me, the FFTF is very much like a son. It represents everything that is right about our nation and, in many ways, the technology that FFTF is capable of developing is, in my opinion, absolutely crucial to the welfare of our nation—and possibly all of humanity. Hence, like a responsible son, it deserves to live and make the unique contributions to society that only it can make.

During the last two years of my association with this marvelous machine, I had the pleasure of traveling all around the world in hopes of establishing sufficient support for FFTF to turn it into a true international user facility. Nowhere did I ever hear a disparaging remark about the technical capabilities of this queen ship. It is universally recognized among the qualified technical community that it is in a class all by itself.

There were certainly questions related its cost of operation. Indeed, it is not an inexpensive machine to run. But quite frankly, the costs of operation (though substantial) are, I believe, miniscule in comparison to the benefits that can still be derived from this facility. Furthermore, I know that substantial private capital is available to offset federal expenses, but this option has never been seriously considered by the Department of Energy. Hence, if costs are truly a pivotal issue, a public/private partnership should be given full and honest consideration.

The missions have been well articulated, so there is no reason to repeat these here. I simply submit that if the United States has any hope of re-establishing itself as a world leader of nuclear technology—a technology that is CERTAIN to gain in importance on the global scene—restarting the FFTF would be both technically and symbolically perhaps the most important forward-looking decision it could make.

Alan E. Waltar
 Professor and Head
 Department of Nuclear Engineering
 Texas A&M University
 129 Zachry Engineering Center
 College Station, TX 77843_3133
 Phone: 979_845_1670
 Fax: 979_845_6443
 e_mail: waltar@ne.tamu.edu

Response to Commentor No. 31

- 31-1** **31-1:** DOE notes the commentor's support for Alternative 1, Restart FFTF.
- 31-2:** DOE has not ruled out shared-cost approaches related to future operations of isotope production facilities. Although private manufacturers produce medical radioisotopes, DOE remains the key provider for a large number of radioisotopes that are used in relatively small quantities by individual researchers at universities and hospitals. Because their application is initially experimental, these isotopes are not generally purchased in large-enough quantities to make their production financially attractive to private industry. Under the NI PEIS proposed action and consistent with its mandates under the Atomic Energy Act, DOE would enhance its existing nuclear facility infrastructure to, among other things, more effectively support production of radioisotopes for medical applications and research. DOE's intent is to complement commercial sector capabilities to ensure that a reliable supply of isotopes is available in the United States to meet future demands, and encourage the commercial sector to privatize the production of isotopes that have established applications to a level that would support commercial ventures.
- 31-2**
- 31-1**

Commentor No. 32: Ken and Nancy VanDyken

From: Ken (038) Nancy VanDyken[SMTP:NVANDYKEN@PRODIGY.NET]
Sent: Sunday, August 20, 2000 3:12:57 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: FFTF
Auto forwarded by a Rule

We believe that FFTF should be restarted for medical isotope production and for use in cancer diagnosis, treatment and research. It makes little logical sense to toss aside this facility and its unique abilities for our nation. Thank you.

_Ken & Nancy VanDyken
nvandyken@prodigy.net

32-1***Response to Commentor No. 32***

32-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 33: Sidney J. Goodman

From: Sidney J. Goodman[SMTP:SJGDESIN@MINDSPRING.COM]
 Sent: Saturday, August 19, 2000 9:44:13 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Cc: Sidney J. Goodman
 Subject: The nuclearization of space
 Auto forwarded by a Rule

To whom it may concern:

I am horrified by the arrogant schemes proposed by NASA to nuclearize space.

The risks being stealthily foisted on an unsuspecting public are atrociously unacceptable.

The assurances issued by NASA reek of unethical and stupid neglect of fundamental reality.

NASA's funding deserve drastic cuts.

Angry in Paramus,

Sidney J. Goodman, P.E., M.S.M.E.
 170 Villanova Drive
 Paramus, NJ 07652

33-1***Response to Commentor No. 33***

33-1: DOE notes the commentor's opposition to NASA's use of nuclear materials for space missions. NASA's policies concerning nuclear power are outside of the scope of this PEIS. Through a Memorandum of Understanding with NASA, DOE provides radioisotope power systems, and the plutonium-238 that fuels them, for space missions that require or would be enhanced by their use. These radioisotope power systems have been used for almost 40 years, and have repeatedly demonstrated their performance, safety, and reliability in various NASA space missions. NASA establishes the need and requirements for space missions and provides a thorough NEPA evaluation for each launch.

Commentor No. 34: Janice Jolly

From: JANJOLLY@aol.com%internet[SMTP:JANJOLLY@AOL.COM]
 Sent: Saturday, August 19, 2000 8:01:49 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: Closedown of Fast Flux Test Facility
 Auto forwarded by a Rule

I am writing to express my sincere concern at learning of your intent to close down the Fast Flux Test Facility, as expressed in the draft "Nuclear Infrastructure Programmatic Environmental Impact Statement" issued for hearing and comment. As the newest, and the most advanced, versatile and safest of all DOE reactors, its purpose has always been beneficial uses of nuclear science. It has never been a defense reactor. We understand that some 20 years of design life remain for the reactor. The U. S. needs a wide variety of isotopes for leading edge medical research and therapy. Materials that could have been made at FFTF will result in clinical trials for several types of cancer, arthritis and other medical concerns being cancelled or abandoned. Useful Plutonium isotopes can also be produced at this facility rather than buying supplies from Russia. Any new facility to do these same important jobs would cost on the order of \$3 billion to \$9 billion to reestablish at another locality. We need FFTF, please restart it.

Sincerely,

Janice Jolly

34-1

34-2

34-1

Response to Commentor No. 34

- 34-1:** DOE notes the commentor's support of Alternative 1, Restart FFTF and opposition to Alternative 3, Construct New Accelerator(s) and Alternative 4, Construct New Research Reactor.
- 34-2:** See response to comment 34-1.

Commentor No. 35: Tanja Winter

From: Tanja Winter[SMTP:TANJA@CTS.COM]
 Sent: Friday, August 18, 2000 11:53:41 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: What happened to renewables?
 Auto forwarded by a Rule

RE: DOE Releases Draft Nuclear Infrastructure Programmatic Environmental Impact Statement

I urge you stop your continued investment in nuclear technology. It is an outrage that the DOE has remained a major player in the promotion and subsidy of nuclear power and weapons research.

All DOE research and development money should be directed toward renewables such as solar voltaic, etc. There should be no more federal funding for nuclear of ANY kind. Both weapons and power are too dangerous and too expensive. All the social, environmental and medical costs are ignored and the public is once again being taken for a ride.

Right from the start "Atoms for Peace" was a cover for the nuclear weapons program. Unfortunately we know that all this "public input" is for show only. Your decisions to go with nuclear have already been made. It is unfortunate that neglect of human needs today and of future generation will be the price paid.

Tanja Winter, 8315 Paseo Del Ocaso, La Jolla, CA 92037

35-1

35-2

Response to Commentor No. 35

35-1: The commentor's opposition to nuclear technology is noted. DOE also notes the commentor's interest in alternative energy sources, although issues of research and development of alternative energy sources are beyond the scope of this NI PEIS. Other offices of DOE are responsible for the research and development of alternative energy sources.

The actions proposed in the NI PEIS neither support nor involve weapons material development. All social, medical, and environmental impacts of all alternatives, including no action, are evaluated in this PEIS. The results of this evaluation are presented in EIS Volume 1, Section 2.7.1.

35-2: The Atoms for Peace Program promoted peaceful applications of nuclear technology. The program was not a cover for nuclear weapons development. DOE policy encourages effective public participation in its decision-making process. In compliance with NEPA and CEQ regulations, DOE provided opportunity to the public to comment on the scope of the NI PEIS and the environmental impact analysis of DOE's proposed alternatives. DOE gave equal consideration to all comments. In preparing the Final NI PEIS, DOE considered comments received from the public. No decisions have been made with regard to the facilities and locations evaluated to fulfill the requirements of the DOE missions. DOE's Record of Decision for the NI PEIS will be based on a number of factors including environmental impacts, public input, costs, nonproliferation impacts, schedules, technical assurance, and other policy and programmatic objectives.

Commentor No. 36: Kevin J. Bartlett

From: Kevin Bartlett[SMTP:KJBART@EMAIL.MSN.COM]
Sent: Wednesday, August 16, 2000 8:28:01 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: RESTART FFTF
Auto forwarded by a Rule

8_16_00

Colette E. Brown,
U.S. Department of Energy,
NE_50, 19901 Germantown Road,
Germantown, MD 20874_1290,
1_877/562_4592
Nuclear.Infrastructure_PEIS@hq.doe.gov

Kevin J. Bartlett
3814 W Rockwell Ave
Spokane, WA 99205
(509) 323_0951

Dear Collette E. Brown:

I believe that FFTF should restart due to the variety and quantity of tasks FFTF can perform, and due its s proven safety and reliability. With alternative two, existing facilities can't provide the quantity and flexibility that FFTF offers. Construction of new accelerators are cost prohibitive, don't offer the flexibility FFTF offers, and will require far more electrical power than this country currently has available. Construction of a new research reactor makes totally no sense when you have a proven reactor that is already built and has procedures to operate it. Not to mention the politics to get a new reactor permitted, and the very high costs of trying to build it. The last alternative of permanently deactivating FFTF would mean deactivating a facility that is environmentally safe, and has an expected life of 35 years left of operation.

The simplest alternative is to do nothing, which DOE has perfected. Here in Washington State we amazingly enough have a Major League Baseball team in Seattle. For years they were looked upon as little more than a minor league team, then the State government had the foresight to build a state of the art baseball stadium in Seattle (Safeco Field). Now the Mariners are top of their division, and their stadium will host the MLB All_star Game next season. My point is, if you build it, they will come. If somebody has the vision to restart FFTF and manage it well, old successful missions will return, along with new missions not developed yet due to lack of opportunity. There is no telling how many lives can be saved, or significantly improved due to medical isotopes produced at FFTF.

Thank You For Your Time,
Kevin Bartlett

Response to Commentor No. 36

- | | |
|-------------|---|
| 36-1 | 36-1: DOE notes the commentor's support for Alternative 1, Restart FFTF. |
| 36-2 | 36-2: DOE notes the commentor's opposition to Alternative 2, Use Only Existing Facilities. |
| 36-3 | 36-3: DOE notes the commentor's opposition to Alternative 3, Construct New Accelerator(s). |
| 36-4 | 36-4: DOE notes the commentor's opposition to Alternative 4, Construct New Research Reactor. |
| 36-5 | 36-5: DOE notes the commentor's opposition to Alternative 5, Permanently Deactivate FFTF. |
| 36-6 | 36-6: The commentor's position is noted. |

Commentor No. 37: Karen L. Skelly

From: Karen_L_Skelly@rl.gov%internet[SMTP:KAREN_L_SKELLY@RL.GOV]
Sent: Thursday, August 17, 2000 2:09:37 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: FFTF SUPPORT
Auto forwarded by a Rule

Political agendas should be set aside and the FFTF should be restarted for the purpose of producing medical isotopes.

Thank you
K. L. Skelly

37-1***Response to Commentor No. 37***

37-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 38: Edward Maiuri

From: Edward G Maiuri[SMTP:EMAIURI@JCPENNEY.COM]
Sent: Friday, August 18, 2000 11:21:12 AM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: FFTF
Auto forwarded by a Rule

I support the Fast Flux Test Facility and would like to see it become a reality.

38-1

Cordially,
Edward Maiuri
Store Manager
0164_4

Response to Commentor No. 38

38-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 39: Lynn Reer

From: Lynn Reer[SMTP:LREER@WORLDACCESSNET.COM]
 Sent: Friday, August 18, 2000 12:34:18 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: Hanford
 Auto forwarded by a Rule

This is to express concern, fear, and outrage at the idea of starting of FFTF or any other nuclear processes at Hanford. We have not even cleaned up the nuclear waste that already exists. Please have compassion and wisdom and do not pursue this course.

Sincerely,

Lynn Reer

39-1

39-2

Response to Commentor No. 39

39-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

39-2: DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram funds designated for Hanford cleanup, regardless of the alternative(s) selected.

Commentor No. 40: David Babad

From: David Babad[SMTP:DAVID_BABAD@AUTO_SOFT.COM]
 Sent: Tuesday, August 15, 2000 6:23:19 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: FFTF at Hanford, Wa.
 Auto forwarded by a Rule

Collette E. Brown
 15 August, 2000
 NE_50
 US Dept. of Energy
 19901 Germantown Rd.
 Germantown, MD 20874

Ms. Brown,

These comments are in response to the news that the DOE is considering restart of the FFTF at Hanford, Wa. I will be unable to attend the public comment forums in Hood River, Or. and Portland, Or. Please see that this letter is included in the proceedings of one of those meetings.

I find the DOE's attitude remarkable, and not a little disgusting, that the government would consider restarting the FFTF before adequately providing for the waste stream that this reactor would produce. Hanford has an abysmal record of containing its past waste stream. This stream currently is moving toward the Columbia river and very little is being done to stop the plume. Now you are suggesting that the NorthWest should shoulder yet more toxins?

If I were the DOE's parent I would tell you to go clean up your room before you take anything else out to play with!

We need solutions; not more pollution.

As you will no doubt notice, I fall strongly on the NO category concerning the FFTF restart.

Thank you,

David Babad
 32865 Watson Rd.
 Scappoose, Or. 97056

40-1

40-2

40-3

Response to Commentor No. 40

40-1: Management of wastes that would be generated under implementation of Alternative 1, Restart FFTF, is discussed in Section 4.3 of Volume 1 (e.g., see Section 4.3.1.1.13). Section 4.3.1.1.13 was revised to clarify that, the Hanford waste management infrastructure is analyzed in this PEIS for the management of waste resulting from FFTF restart and operation. This analysis is consistent with policy and DOE Order 435-1, that DOE radioactive waste shall be treated, stored, and in the case of low-level waste, disposed of at the site where the waste is generated, if practical; or at another DOE facility. However, if DOE determines that use of the Hanford waste management infrastructure or other DOE sites is not practical or cost effective, DOE may issue an exemption under DOE Order 435.1 for the use of non-DOE facilities (i.e., commercial facilities) to store, treat, and dispose of such waste generated from the restart and operation of FFTF. In addition, Section 4.3.3.1.13 and 4.4.3.1.13 also address the potential impacts associated with the waste generated from the target fabrication and processing in FMEF and how this waste would be managed at the site.

40-2: DOE was tasked by Congress in the Atomic Energy Act of 1954, as amended, to "ensure the availability of isotopes for medical, industrial, and research applications, meeting the nuclear material needs of other federal agencies, and undertaking research and development of activities related to development of nuclear power for civilian use." The purpose of this PEIS is to determine the environmental and other impacts to accomplishing this mission from all reasonable existing and new DOE resources. The FFTF at the Hanford Site was one of several existing DOE resources that was assessed for this mission.

DOE notes the commentor's concerns regarding the migration of contaminants to the Columbia River. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

More specific to the stated missions presented in the NI PEIS, FFTF is located approximately 4.5 miles from the Columbia River. There are no

Commentor No. 40: David Babad (Cont'd)

Response to Commentor No. 40

discharges to the river from FFTF and no radioactive or hazardous discharges to the groundwater. Analyses presented in Chapter 4 of the NI PEIS (e.g., Sections 4.3.1.1.4, 4.3.3.1.4, 4.4.3.1.4, 4.5.3.2.4, and 4.6.3.2.4) indicate that there would be no discernible impacts to groundwater or surface water quality at Hanford from normal operation of the existing Hanford facilities in support of the stated missions. Also, no water quality impacts would be expected as a result of permanent deactivation of FFTF (Section 4.4.1.2.4).

The Hanford Site also has a comprehensive waste minimization and pollution prevention program in place as summarized in Volume 1, Section 3.4.11.7 that would control any new site activities.

40-3: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

Commentor No. 41: Norm and Billie Davis

From: Ncbj2@aol.com%internet[SMTP:NCBJ2@AOL.COM]
Sent: Monday, August 14, 2000 11:27:39 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: (no subject)
Auto forwarded by a Rule

We support start up of FFTF
Norm and Billie Davis

41-1

Response to Commentor No. 41

41-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 42: Frank Shaw

From: Pressley F Shaw, Jr.[SMTP:P.F.SHAW@JUNO.COM]
Sent: Tuesday, August 15, 2000 12:07:54 AM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: Nuclear.Infrastructure_PEIS; decision
Auto forwarded by a Rule

Nuclear,Infrastructure

I'm in favor of the restart of F.F.T.F. for the medical isostopes. Plus anyother it can help the American people to become independent country, not being dependant of another country. So please let be sensible about our lives, and restart the facilty, we need so desperately.

Frank Shaw
86503 West O.I.E. Hwy.
Prosser, WA. 99350
h. 509_973_2736

42-1***Response to Commentor No. 42***

42-1: DOE notes the commentor's support for Alternative 1, Restart FFTE.

Commentor No. 43: Brian R. Duncan

From: Brian R. Duncan[SMTP:BDUNCAN1@HOME.NET]
Sent: Monday, August 14, 2000 10:16:18 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: FFTF
Auto forwarded by a Rule

Just a quick note but don't let its brevity be confused with lack of interest. I strongly support the start_up of the Fast Flux Test Facility (FFTF) at the Hanford Reservation Site in Washington State. FFTF can start making Medical Isotopes for the treatment of many different forms of Cancer and Medical Research.

Brian Duncan
San Diego, CA
|

43-1**Response to Commentor No. 43**

43-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 44: Gerald L. and Deborah A. Maiuri

From: JDMAIURI@aol.com%internet[SMTP:JDMAIURI@AOL.COM]
Sent: Monday, August 14, 2000 10:51:31 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: RESTART FFTF
Auto forwarded by a Rule

MY HUSBAND AND I STRONGLY SUPPORT THE RESTART OF
THE FAST FLUX TEST FACILITY (FFTF).

44-1

THANK YOU,

GERALD L MAIURI
DEBORAH A MAIURI
JDMaiuri@aol.com
1925 McPherson
Richland WA 99352

Response to Commentor No. 44

44-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 45: D. A. Johnson

From: DAJDHOME@aol.com%internet [mailto:DAJDHOME@aol.com]
 Sent: Friday, August 04, 2000 1:06 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: FFTF

Please restart FFTF for medical isotopes.
 Thank you for this chance to comment.

D.A. Johnson

45-1

Response to Commentor No. 45

45-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 46: Chris Pennock

From: C(038)L Pennock [mailto:blue@3_cities.com]
Sent: Monday, August 07, 2000 3:16 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: FFTF Hanford

Please re_start FFTF for Medical Isotopes.

Thank you,
Chris Pennock

|| 46-1

Response to Commentor No. 46

46-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 47: Keely Lake

From: Keely Lake [mailto:keely_lake@uiowa.edu]
 Sent: Tuesday, August 08, 2000 2:34 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: ?Check_Subject

Dear Sir or Madame,

I am writing to show my support of the FFTF (Fast Flux Test Facility) in Richland, Washington. I believe that it is important that it restart with the purpose of making medical isotopes. I realize that I do not live in that area, but I am concerned that no medical isotopes are currently being produced in this country when we have a facility which can do so if given proper support. Please count me among those who support the FFTF facility. Thank you.

Sincerely

Keely Lake

Graduate Student, Univ. of Iowa
 2028 9th St. #8
 Coralville, IA 52241

47-1

Response to Commentor No. 47

47-1: DOE notes the commentor's support for Alternative 1, Restart FFTF. The commentor should note that medical isotopes are currently produced in the United States.

Commentor No. 48: Richard A. Gorringer

From: Richard A. Gorringer [mailto:richgorr@mail.pacifier.com]
 Sent: Friday, August 11, 2000 3:32 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: Fast Flux Test Facility at Hanford

Collette E. Brown,
 NE_50
 US Dept. of Energy
 19901 Germantown Rd.
 Germantown, MD 20874

Dear Ms. Brown:

I OPPOSE any nuclear reactor startup at Hanford. Specifically, I urge you to decommission the Fast Flux Test Facility FFTF, the advanced liquid metal nuclear reactor at Hanford. There are already billions of gallons of high_level waste out of control at Hanford, the most contaminated place in the Western Hemisphere. Reactor operation would only create more radioactive waste streams, which would mean even more dangerous waste to manage.

And I live downwind from this toxic mess!

Sincerely,

Richard A. Gorringer, Ph. D.
 3574 NE Stanton Street
 Portland, OR 97212

Response to Commentor No. 48

- 48-1:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF and support for Alternative 5, Permanently Deactivate FFTF.
- 48-2:** See response to comment 48-1.
- 48-3:** DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

There are currently 53 million gallons of waste stored in 177 underground tanks at Hanford, primarily in double-shell structures. The disposition of this waste has been determined and the project is currently underway. As discussed throughout Section 4.3 of Volume 1, none of the proposed alternatives would add waste to the waste tank inventories at Hanford.

Management of wastes that would be generated under implementation of Alternative 1, Restart FFTF, is discussed in Section 4.3 of Volume 1 (e.g., see Section 4.3.1.1.13). Section 4.3.1.1.13 was revised to clarify that, the Hanford waste management infrastructure is analyzed in this PEIS for the management of waste resulting from FFTF restart and operation. This analysis is consistent with policy and DOE Order 435-1, that DOE radioactive waste shall be treated, stored, and in the case of low-level waste, disposed of at the site where the waste is generated, if practical; or at another DOE facility. However, if DOE determines that use of the Hanford waste management infrastructure or other DOE sites is not practical or cost effective, DOE may issue an exemption under DOE Order 435.1 for the use of non-DOE facilities (i.e., commercial facilities) to store, treat, and dispose of such waste generated from the restart and operation of FFTF. In addition, Section 4.3.3.1.13 and 4.4.3.1.13 also address the potential impacts associated with the waste generated from the target fabrication and processing in FMEF and how this waste would be managed at the site.

Commentor No. 49: George Baggett

From: GeoBaggett@aol.com%internet [mailto:GeoBaggett@aol.com]
 Sent: Wednesday, August 02, 2000 12:26 PM
 To: INFRASTRUCTURE-PEIS, NUCLEAR
 Cc: KCHNews@sound.net%internet; Kbirns@kuhub.cc.ukans.edu%internet;
 tbogdon@webtv.net%internet; J5bowser@aol.com%internet;
 gicron@nex.net.au%internet; accuppy@planetkc.com%internet;
 DikoDawson@aol.com%internet;
 gntlcare@gntlcareanimalhospital.com%internet;
 Fenton.Kathleen@epamail.epa.gov%internet; fneff@cctr.umkc.edu%internet;
 maguy@sirius.com%internet; Rachel93@wichita.infi.net%internet;
 mollyivins@star-telegram.com%internet; KingHouse@aol.com%internet;
 Martyk@allspecies.org%internet; mmansur@kcstar.com%internet;
 Mtmc929@aol.com%internet; mimimoffat@lawyer.com%internet;
 SueBNelson@aol.com%internet; Gmorisaki@aol.com%internet;
 dreck@sky.net%internet; tshistar@falcon.cc.ukans.edu%internet;
 StanSlaugh@aol.com%internet; Suzyspalty@aol.com%internet;
 Claudine.Thomas@worldnet.att.net%internet;
 ross.vincent@sierraclub.org%internet; Hartwood@gvi.net%internet;
 GeoBaggett@aol.com%internet
 Subject: Comment to DOE RE: development of nuclear energy facilities
 PEIS July 2000

Colette E. Brown, NE-50
 U.S. Department of Energy
 19901 Germantown Road
 Germantown, MD 20874

RE: Comment on DRAFT PEIS

Thank you for providing the Summary Document regarding the current Programmatic Environmental Impact Statement for Expanded Nuclear Energy Research and Development and Isotope Production Missions in the US. The document is an improvement in readability over past documents, and below are my comments.

Comment #1.

Regarding the mission of the Department of Energy as mandated by the Atomic Energy Act of 1954, a number enlightening experiences have occurred as a result of attempting to meet the "needed" isotopes for medical, industrial, and research applications. In subsidizing various industries "needing" these isotopes, the numerous DOE facilities have created environmental and economic burdens with no remediation endpoint in site. Thus, this brings to question if the mandate of the Atomic Energy Act of 1954 is still valid at this point in history. Therefore, it would seem prudent for the Department of Energy to request the U.S. Congress to aid the downsizing of the Department's mission by a modification that will limit the scope of responsibility of the Department to only meeting the requirements for nuclear isotopes in medical and research applications, and environmental restoration of the numerous facilities in North America.

Response to Commentor No. 49

49-1: DOE notes the commentor's views concerning DOE's missions. DOE is guided by the intentions of the U.S. Congress as found in legislation and appropriations. Currently, Congress continues to provide funding directing DOE to carry out its mandate for isotope production and civilian nuclear energy research and development. Congress continues to direct DOE to complete its environmental restoration commitments at existing DOE sites.

Commentor No. 49: George Baggett (Cont'd)

Granted, this reduction in the mission would greatly impact the nuclear power industry. However, as we look at the halting of the development and expansion of this technology, it becomes very clear that we will soon be entering a period of closure and remediation of aging facilities. Some of these facilities have been operating or are in a standby position, well beyond their anticipated closure. A notable reduction in the availability of fuel products will then force closure of these aging facilities, and greatly reduce complications that are so notable throughout the world.

The driving rationale in my mind is that nuclear isotopes have been demonstrated to have significant value. I am very concerned that future generations will look back upon the last forty-five years of use and waste of these valuable materials, and they will be extremely critical as to why we were so short sighted in wasting these materials primarily to boil water and contaminate the environment.

Comment #2

I strongly disagree with the statement that "In view of these energy and environmental contributions, there is renewed interest in nuclear power to meet an equivalent portion of the Nation's future expanding energy requirements." None of the environmentalists that I know are remotely considering nuclear power as a method of reducing greenhouse gases. Most familiar with the ramifications of this technology know the tradeoffs do not come close to meeting any benefit in the reduction of greenhouse gases.

There may be the ilk of Westinghouse, Bechtel, and others whom would profit from a so-called "renewed interest," but the Department should be assured that there is a quiet majority of Americans who oppose this technology, whom will side with more militant and vocal groups who will rise against any proposed commercial or research nuclear power plant development. The Department should also be aware that siting such facilities is and will continue to be virtually impossible. Further, as the fleet of nuclear power stations become obsolete, the cost of remediation and closure will place in public view such a staggering price tag upon the true costs of this technology that the circle of opponents will grow to include the economic and finance community.

49-1
(Cont'd)

49-2

Response to Commentor No. 49

49-2: Clean, safe, reliable nuclear power has a role today and in the future for our national energy security. In recognition of this need, nuclear energy research and development programs have been initiated to address potential long-term barriers to expanded use of nuclear power (e.g., nuclear waste, proliferation, safety, and economics) and to ensure that current nuclear power plants can continue to deliver adequate and affordable energy supplies. An enhanced DOE nuclear facility infrastructure is required to support such nuclear energy research and development for civilian applications. Information on the need for nuclear energy research and development is provided in Section 1.2.3 of Volume 1.

Commentor No. 49: George Baggett (Cont'd)

Comment #3

Granted, there are significant benefits from medical and some commercial use of nuclear isotopes. However, the gist of the public discussion regarding this document is how and where to draw the line on the continued mission of the Department of Energy. If one considers the current direction of remediation of DOE facilities throughout North America, the tasks and costs are staggering. There are considerable challenges at SRS, Hanford, as well as some of the smaller facilities like the Paducah - Gaseous Diffusion Plant. The environmental restoration program is the most important program mission for the Department, not only to ensure the problems do not worsen, but to demonstrate to the public that seemingly insurmountable problems can be resolved. The Department has demonstrated considerable talent and persistence in its environmental restoration program to date, but as for resolving the seemingly "insurmountable problems," there is considerable work to do.

As a member of the Waste Commission in Kansas City, Missouri, some years ago, we learned a valuable lesson in the management of specific tasks. That lesson was that though history had told us that we (the city) were responsible for the waste problems, it was not necessarily so. Two examples:

(1) old tires and (2) used motor oil come to mind. Under the old form of thinking the problem would need to be resolved by the city. The city would have to provide management for these waste products as an alternative to improper disposal - dumping and discharge of used motor oil to the sewer or a spot on the ground. We first resolved that it would be best to recycle these waste streams. Second, we noted where the waste streams were concentrated. We then approached tire dealers and oil change shops, and learned that they had a system in place to recycle these waste streams. We held meetings with representatives from these groups, requested that they aid us in expanding the program to include do-it-yourself sources, and then set in place a city ordinance requiring suppliers of tires and motor oil to provide suitable and responsible disposal options for the waste products generated by the use of their products. The result is that the city is not responsible for these waste streams, retail tire outlets will take used tires from ordinary citizens (often charging \$0.50 per tire), oil change stores and auto parts stores provide a service of taking and collecting used motor oil to be recycled, and all this is done without cost to the city or the tax payer.

Response to Commentor No. 49

49-3

49-3: DOE notes the concerns expressed by the commentor relating to the multiple missions of DOE. Both isotope production and environmental restoration must be managed in ways that address each mission. In the case of isotopes, DOE is aware of the advantages of commercial production, and its isotope programs have and will continue work to that end, where appropriate. DOE, at the direction of the U.S. Congress, has a wide range of cleanup as well as research and development missions under the Atomic Energy Act. Any enhancement of DOE's nuclear infrastructure would be made only if it is clear that to do so would help better meet isotope and civilian nuclear energy research missions, and be consistent and in balance with environmental stewardship at DOE sites.

Commentor No. 49: George Baggett (Cont'd)

The DOE is in the same situation. Asked to resolve all problems, the agency has evolved into a complex organization that assumes that they must provide all nuclear isotopes used in America. In my opinion, the mission of the DOE has changed to environmental restoration and management of the waste products and materials from decommissioning weapons. Conservation of the value of isotopes, as well as purchase valuable isotopes from the world communities are compatible with this mission. Yet just because a commercial venture desires a supply of isotopes for a nonmedical venture, I question the mission statement that results in subsidizing such a venture and adds considerable cost and burden to the Department and its more important missions.

Thus, considering options 1-5, Alternative 5 - Permanently Deactivate FFTF (with No New Missions) comes closest to my thinking. Second would be the No Action Alternative.

For discussion, I can be reached at the address below:

George Baggett
820 West 35th Street
Kansas City, Missouri 64111
Phone#: 816-931-9578
Fax#: 816-931-7578

As in the past, I will be more that pleased to continue to review DOE documents and summaries. I will also be pleased to provide comment as time permits.

**49-3
(Cont'd)**

49-4

49-5

Response to Commentor No. 49

49-4: DOE notes the commentor's support for Alternative 5, Permanently Deactivate FFTF, or as a second choice, the No Action Alternative.

49-5: See response to comment 49-4.

**Commentor No. 50: Paige Knight
Hanford Watch**

From: paige s knight <paigeknt@juno.com>
To: collette.brown@us.doe.gov
Cc: hanfordwatch@telelists.com,
Date: Wed, 26 Jul 2000 11:24:16 _0700
Subject: FFTF report and hearings
Message_ID: <20000726.115924._129217.0.paigeknt@juno.com>

Dear Collette,

I can't begin to express how frustrated and close to outrage I am at the DOE's separation of the of the cost and nonproliferation studies on the FFTF (Fast Flux Test Facility) at Hanford.

Apparently, the US DOE, in it's continuing disfunction, insists on the fragmentation or piece_mealing of nuclear weapons/cleanup issues. It also appears that the Department has retrenched more than ever into its "DECIDE, Announce, DEFEND" posture. You have heard the concerns of the public out West who have the most to loose if the FFTF is restarted.

So, isn't it great that we get a 3rd chance to say NO yet another time, but will not able to address the issues of cost and weapons proliferation because they are not "on the table" yet.

I request on behalf of numbers of us in the Hanford region that the hearings on the FFTF be delayed until the other studies come out. We have experienced receiving pertinent documents the day of or hour after a public hearing is held. It doesn't fly.

You have little choice but to get us the pertinent documents or delay the hearings until we receive them with time to digest them, unless you want to be blatantly undemocratic (as in democracy) in your handling of these issues. I urge you to do the right thing.

Sincerely,
Paige Knight, Hanford Watch
503_232_0848

50-1

Response to Commentor No. 50

50-1: CEQ (40 CFR 1500 et seq.) and DOE (10 CFR Part 1021) implementation regulations do not require inclusion of cost and nonproliferation studies in an environmental impact statement. The basic purpose of the NI PEIS is to describe the alternatives under consideration for implementation (Section 2.5 of Volume 1) and the environmental impacts that would occur if these alternatives were implemented (Chapter 4 of Volume 1). Pursuant to CEQ regulations (40 CFR 1505.1(e)), agencies are encouraged to make ancillary decision documents available to the public before a decision is made. The associated cost report and nonproliferation report were made available to the public on August 24, 2000 and September 8, 2000, respectively.

Production of nuclear weapons and Hanford cleanup are outside the scope of this NI PEIS. Plutonium-238 produced in support of NASA's deep space missions (Section 1.2.2) is not used to make nuclear weapons. Missions described in Section 1.2 of Volume 1 are unrelated to the national defense. Implementation of Alternative 1, Restart FFTF, would have no impact on funding for ongoing cleanup activities at the Hanford Site (Section N.3.2 of Volume 2).

The commentor's concerns about Alternative 1, Restart FFTF, are noted. As discussed throughout Section 4.3 of Volume 1, implementation of Alternative 1 would pose small risks to persons in areas adjacent to the Hanford Site. Risks to persons in areas more than 80 kilometers (50 miles) from the site would be essentially zero.

DOE did not delay public meetings on the Draft NI PEIS because ancillary decision documents such as the cost report and nonproliferation report are not required to evaluate the environmental impacts that would result from implementation of the alternatives described in Section 2.5 of Volume 1.

Commentor No. 51: Everett L. Hughes

From: EVERETT L HUGHES EA
 To: nuclear.infrastructure_PEIS@hq.doe.gov
 Sent: Saturday, July 29, 2000 1:59 PM
 Subject: civilian nuclear

DOE:

I have not read, word for word, the document sent to me in the mail.

However, I believe we are 25 (twenty_five) years behind what has been needed in the areas of products for the citizens developed by nuclear means.

We must move forward, for the good of the United States.

The agenda of multi_national enviornmental groups must be worked around. We are leading the world in our adherence to those issues.

Fast Flux must move forward.

ALL production must be domestic, please do not buy Pu_238 from Russia, or any other source.

I sense that our control and development of these product for the benefit of US civilians, is in the interest of our National Security.

I have no degree in this area.....but I have an awareness of our needs that can be met via what we seem to fear.

Everett L Hughes EA
 360_427_0427 Fax 360_427_0421
www.everetthughes.com
www.accountant_city.com/everetthughes
 Collier Bldg Suite 4
 Shelton, Washington

51-1

51-2

Response to Commentor No. 51

-
- 51-1:** DOE notes the commentor's support for Alternative 1, Restart FFTF.
- 51-2:** DOE notes the commentor's support for the domestic production of plutonium-238 and medical and industrial isotopes.

Commentor No. 52: Kristine R. Brotherton

From: Kristine Rosemary [mailto:rose2@gemsi.com]
 Sent: Wednesday, July 26, 2000 8:28 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: draft peis comment due by 9/11/00

please forward or direct to:
 Ms. Colette E. Brown, NE_50
 usdoe germantown maryland

Dear Ms. Brown,

I appreciate very much receiving the draft doe/eis_03100 for expanded civilian nuclear energy R&D and for the opportunity to review the document.

However, as a resident within a 50 mile radius of the Hanford site, I must respectfully request that the department consider cleanup at Hanford and at the other national labs to be an absolute top priority ahead of all other missions. Land restoration at the Hanford site, specifically at the Fitzner_Eberhart Arid Lands Ecology reserve, also is in the public interest, as the native shrub_steppe sagebrush grasslands preserved at Hanford for the past 50 years are an outstanding example of lands among the most rare and endangered of those plant communities in the continental U.S. Very fine work has been done at the site to make inventories of the many plant and animal species occurring on Hanford lands by federal and state agencies, Battelle, and with the cooperation of The Nature Conservancy. A good effort has begun there which probably could use more funding and support.

However, additional R&D of the kind described in the eis under review does not appear to be compatible with those efforts. Please accept my preference for a No Action alternative, and if that is not a possibility, for alternative 2, use only existing operational facilities. Thanks for the chance to comment.

Very truly yours,
 kristine r. brotherton
 moses lake, washington

52-1

52-2

52-3

Response to Commentor No. 52

- 52-1:** DOE was tasked by Congress in the Atomic Energy Act of 1954, as amended, to “ensure the availability of isotopes for medical, industrial, and research applications, meeting the nuclear material needs of other federal agencies, and undertaking research and development of activities related to development of nuclear power for civilian use.” The purpose of this PEIS is to determine the environmental and other impacts to accomplishing this mission from all reasonable existing and new DOE resources. The FFTF at the Hanford Site was one of several existing DOE resources that was assessed for this mission.
- DOE notes the commentor’s concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.
- Although the land composing the Fitzner-Eberhart Arid Lands Ecology Reserve is owned by DOE, the management of this and nearly all other National Monument lands at Hanford are now the responsibility of the U.S. Fish and Wildlife Service (F&WS). Funding for that management comes directly from F&WS. All restoration activities from legacy DOE missions on these lands have been completed.
- 52-2:** DOE notes the commentor’s support for the No Action Alternative, or as a second choice, Alternative 2, Use Only Existing Operational Facilities.
- 52-3:** See response to comment 52-2.

Commentor No. 53: Dorothy Meyers

From: Connect2dm@aol.com%internet
 [mailto:Connect2dm@aol.com]
 Sent: Friday, July 28, 2000 2:21 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: re: Please restart FFTF for medical Isotopes!

Hello, Governor Locke,

I have had breast cancer (masectomy was the Doctors answer) and lung cancer;(an upper left lobe labotomy was the Doctors answer). I had gall bladder attacks for 16 years and _finally_ a Doctor used a medical Isotope to determine that the gall bladder was indeed not functioning properly.

Please, seriously consider restarting FFTF to produce medical Isotopes. The Isotopes would not be as expensive, and more people would be employed. I believe this to be a very profitable "Win_Win" enterprise for many people.The most important factor being the saving of lives from cancer and bringing medical costs down. Thank you.

Sincerely,
 Dorothy Meyers
 236 N Palouse St
 Kennewick,Washington 99336
 (509) 582_3111

53-1

Response to Commentor No. 53

53-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 54: Gerald Cox

From: Gerald Cox [mailto:gcox@Harding.edu]
Sent: Friday, July 28, 2000 2:26 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: FFTF

My name is Gerald Cox and I live in Searcy, Arkansas. I am in favor of the restart of FFTF (Fast Flux Test Facility) in Richland, Washington for the purpose of making medical isotopes.

Thank you.

54-1

Response to Commentor No. 54

54-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 55: Tom Clements Nuclear Control Institute

From: Tom Clements [mailto:clements@nci.org]
Sent: Friday, July 28, 2000 1:31 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Cc: Johnson, Shane
Subject: re PEIS hearings

To Whom it Concerns:

I am writing to register my complaint about hearings on the FFTF/isotope production PEIS being held before the public has seen the associated cost and nonproliferation documents. These two documents should be included as part of the PEIS process but as DOE has not yet chosen that path, any PEIS hearings held prior to release of those documents is unacceptable.

I have been informed by DOE that the cost study will be out in early August and the nonproliferation statement at the end of August or first of September. Any slippage in the release of the cost study will insure that it will not be available far enough in advance of the PEIS hearings for the public to be adequately informed. Even as it stands, the nonproliferation assessment might not come out at all until the hearings are over.

Given this bad situation, I request one of two things:

1) that the cost and non_proliferation studies be released immediately, at least two weeks in advance of the first PEIS hearing, or 2) the PEIS hearings be postponed until after the two documents in question have been released and the public has adequate time to review them.

The decision about isotope production and FFTF restart is far too important to give the public short shrift in the decision_making process. I can assure you that withholding information before the hearings will not be productive for this entire process and urge you to take immediate action to change this situation.

Sincerely,

Tom Clements, Executive Director
Nuclear Control Institute
1000 Connecticut Ave., NW Suite 804
Washington, DC 20036, USA
tel. 1_202_822_8444, fax 1_202_452_0892
clements@nci.org www.nci.org/org

55-1

Response to Commentor No. 55

55-1: CEQ (40 CFR 1500 et seq.) and DOE (10 CFR Part 1021) implementation regulations do not require inclusion of cost and nonproliferation studies in an environmental impact statement. The basic purpose of the NI PEIS is to describe the alternatives under consideration for implementation (Section 2.5 of Volume 1) and the environmental impacts that would occur if these alternatives were implemented (Chapter 4 of Volume 1). The comment response process concerned with the environmental impacts of the NI PEIS alternatives is described in Section 1.1 of Volume 3.

The associated cost report and nonproliferation report were made available to the public on August 24, 2000 and September 8, 2000, respectively. Pursuant to CEQ regulations (40 CFR 1505.1(e)), agencies are encouraged to make ancillary decision documents available to the public before a decision is made. The Record of Decision concerning enhancement of DOE's nuclear infrastructure is scheduled for January 2001.

Public hearings on the Draft NI PEIS were not delayed because ancillary decision documents are not required to evaluate the environmental impacts that would result from implementation of the alternatives described in Section 2.5 of Volume 1.

The decision process will be conducted in accordance with 40 CFR 1505.1. Public comments are an integral part of DOE's decision process. All relevant information required to evaluate the environmental impacts that would result from implementation of the alternatives was made available to the public on July 28, 2000. Public hearings on the draft NI PEIS were held at seven locations from August 22, 2000 to September 6, 2000.

Commentor No. 56: Mark Cheney

From: MACHeney3@aol.com%internet[SMTP:MACHENEY3@AOL.COM]
 Sent: Sunday, August 13, 2000 11:07:21 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: FFTF
 Auto forwarded by a Rule

I believe that medical isotopes are needed more than ever in the world today. We have a reactor that can produce them at minimal cost to the public. Since FFTF is a breeder reactor, and according to experts in the nuclear industry, it produces about half the waste that normal reactors do. It is also a smaller reactor; this means it even produces less nuclear waste than a full size breeder reactor. Also, if a great portion of the waste will be actually used as medical isotopes to treat people dying of cancer, why in the world would anybody consider destroying it?!! It seems totally absurd to me. Does anybody in charge of deciding what to do with it understand these facts?

Why haven't these facts been explained to rational environmentalists? Are people going to listen to the far environmental extremists who believe that any amount of waste is bad, or the other ignoramuses to don't even know what's is going on and just want to get involved with any "environmental" cause that comes there way?

If there is some rational explanation for destroy FFTF, I would like to know about it. Until then, I am totally against it.

Mark Cheney
 4606 W 4th Ave
 Kennewick, WA 99336
 509_783_3455

56-1

56-2

Response to Commentor No. 56

- 56-1:** DOE notes the commentor's support for Alternative 1, Restart FFTF, and opposition to Alternative 5, Deactivate FFTF. It should be noted that while FFTF supported the breeder reactor program, it is not itself a breeder reactor, but rather a fast flux research reactor.
- 56-2:** See response to comment 56-1.

Commentor No. 57: John Swanson

From: John Swanson[SMTP:JOHNLSWANSON@WORLDNET.ATT.NET]
 Sent: Sunday, August 13, 2000 4:42:24 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: Comments
 Auto forwarded by a Rule

Comments resulting from a skimming of the Draft PEIS Summary are:

1) In discussing the subject of SPENT FUEL MANAGEMENT (p.S_63), the argument is made that the environmental impacts associated with spent fuel management would remain minimal because the 16 MTHM of spent fuel resulting from FFTF restart is less than 1% of the spent fuel already stored at Hanford. While the conclusion of minimal impact may be valid, the validity of the argument given in support of the conclusion is very questionable.

Comparison of risks should not be based just on spent fuel quantities; it should include factors such as the quantities of hazardous radionuclides contained in the spent fuel. For example, most of the spent fuel currently stored at Hanford contains plutonium at concentrations of ~0.1% or less, while the mixed oxide fuel used in the FFTF contains ~10% or more Pu. Thus, the amount of Pu contained in 16 MTHM of spent FFTF fuel is approximately the same as (NOT <1% as much as) the amount of Pu contained in the 2,133 MTHM of spent fuel that is currently stored at Hanford.

2) Near the bottom of page S_27 is the statement "Collocation would also minimize transportation risks because some isotopes have short half lives." I can readily understand how collocation would minimize transportation risks, but I don't understand the significance of short half lives in this context.

3) Conversions between units should be checked. Two errors that jumped out at me are: a) In the last paragraph on page S_27 _ "(0.2 to 20 kilometers [0.07 to 12.4 miles]) _." A factor of 10 in kilometers should also be a factor of 10 in miles. b) In the next_to_last paragraph on page S_29 _ "200 C (44 F) _." At least one of these numbers is obviously incorrect.

John L. Swanson
 Richland, WA

Response to Commentor No. 57

57-1: The discussion in the Summary and Section 4.8.3.5 of Volume 1 on the cumulative impacts for spent nuclear fuel management at Hanford was revised to clarify that the management of the existing spent nuclear fuel at Hanford results in a dose of less than 0.1 millirem per year of the maximally exposed member of the public. This dose is well within the DOE limits given in DOE Order 5400.5. As discussed in that Order, the dose limit from airborne emissions is 10 millirem per year, as required by the Clean Air Act; drinking water is 4 millirem per year, as required by the Safe Drinking Water Act; and the dose limit from all pathways combined is 100 millirem per year. DOE has committed to remove the spent nuclear fuel at Hanford for ultimate disposition in a geologic repository.

The incremental impacts associated with managing the additional 16 MTHM of FFTF spent nuclear fuel were evaluated in Section 4.3.1.1.14 of the NI PEIS for the restart of the FFTF. As stated, the radiological impact to the public from overall radionuclide releases from the entire FFTF complex during the last year of reactor operation was less than 0.0001 mrem/year. Additionally, the dose contribution from FFTF spent fuel management would be expected to be a small fraction of the FFTF reactor operation dose. Therefore, it would have no discernible impact on the 0.1 mrem/year dose from the existing 2133 MTHM Hanford spent nuclear fuel inventory. The currently used FFTF-specific spent fuel storage system designs (i.e., facility storage vessels and dry storage casks) are the key contributors for determining that the incremental radiological impact is minimal, not the difference in plutonium quantity in the FFTF spent nuclear fuel.

57-2: The statement in the Summary has been revised as follows: Collocation with the irradiation facility would be needed to process some irradiated target materials promptly after removal from the reactor/accelerator because some isotopes have short half-lives. Collocation would also minimize transportation risks.

57-3: Conversions have been checked and corrected.

Commentor No. 58: Jacqueline N. Foxworthy

From: Jacqueline N Foxworthy[SMTP:GRANNYFOX@JUNO.COM]
Sent: Sunday, August 13, 2000 12:49:35 AM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: FFTF
Auto forwarded by a Rule

Sir,

Please re_start the FFTF for medical isotope production for use in cancer diagnosis, treatment and research. My husband passed away a year ago from pancreatic cancer. This cancer has to be diagnosed early and a treatment must be found to stop it's spread when found. I support the re_start of the FFTF for medical isotope production.

Thank you.

Sincerely,
Jacqueline N. Foxworthy
5604 86th Place NE
Marysville, WA 98270

58-1***Response to Commentor No. 58***

58-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 59: Martin Bensky

From: Martin Bensky[SMTP:MBENSKY@EMAIL.MSN.COM]
 Sent: Saturday, August 12, 2000 6:09:21 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Cc: Gordon Rogers
 Subject: FFTF EIS
 Auto forwarded by a Rule

I have been a resident of Richland, Washington, for nearly 23 years, 17 as an employee of the site operating contractor (Rockwell, then Westinghouse) and 6 as a retiree. My background has been heavily in the areas of site performance assessment, long_term waste management, and Systems Engineering. I am currently an alternate to a Public_at_Large seat on the Hanford Advisory Board, but let me make it perfectly clear that my comments are entirely my own as a private citizen and in no way represent views of the Board. Some of my comments, as you will see, are focused upon Hanford cleanup rather than directly on FFTF startup and operation because one of the specious arguments against FFTF is that funding of FFTF will detract from Hanford cleanup funds.

The point I want to make most strongly is that the meetings in Seattle, Portland and Hood River are almost certainly not a source of useful scientific data. If I may be quite frank, the hysterical fears of cancer, etc., that you have heard (or will hear, depending on when you read my comment) in meetings at those locales, are totally unfounded and are the result of effective propagandizing by environmental activist groups. Quite obviously, Seattle is unaffected by FFTF and Hanford cleanup except that the residents pay federal taxes and in the unlikely event that shipments of foreign waste to Hanford are permitted and arrive at the port of Seattle. Residents of Portland, Hood River and, in fact, anyplace downstream of, say, Hermiston, really have no sound basis for claiming that they could be adversely affected by contaminants that might eventually reach the Columbia River from any Hanford sources.

59-1

Response to Commentor No. 59

59-1: DOE notes the commentor's views on the necessity for reliance on objective, scientific data as the basis for sound decision making. DOE is committed to providing the public with comprehensive environmental reviews of its proposed actions in accordance with NEPA, and to providing ample opportunity for public comment on those actions.

Commentor No. 59: Martin Bensky (Cont'd)

If unfounded fears should not be your concern, what then, should you be looking for in the comments from your meetings? The only real issues involve possible adverse impacts of a major facility on the local quality of life (e.g., adequacy of schools and local infrastructure) or perhaps a deep-seated revulsion towards anything "nuclear". I personally would be proud to live in a community that is producing life-saving isotopes and vital materials to support our space program. I believe that that is the prevalent attitude of Tri-citians, and if residents of other communities are somehow ashamed to be part of a "nuclear" project, let them keep FFTF or similar projects out of their communities. Their attitudes and false fears are their own problems, but the dedicated, competent scientists and engineers in this community want to continue to do what we know is right; we cannot combat the lies and distortions that have hampered, and will continue to hamper, our progress.

In summary, let me reiterate my initial point. Your own investigations, separate from these meetings, will provide the objective information that you need in your decision process. Subjective beliefs and attitudes are important, too, but the attitudes and beliefs of the people right on the scene; i.e., the people of Benton and Franklin counties, matter a whole lot more than those of activists far from where the action is.

Martin Bensky
2121 Briarwood Ct.
Richland, Washington 99352
(509) 375_1704
mbensky@msn.com

59-1
(Cont'd)

Response to Commentor No. 59

The text on page 2-66 has been revised to incorporate the comment on extended outage. Growth estimates in diagnostic and therapeutic medical isotope usage in the United States were based on a study issued by Frost and Sullivan in 1997. In the period since the initial estimates were made, the actual growth of medical isotope use has tracked at a rate consistent with the study findings. The Cost Report presents operating costs for each alternative. The operating cost estimates did not take credit for revenue from the sale of isotopes or leasing facilities to offset the operating costs.

Commentor No. 60: George Flanagan (Cont'd)

The isotope demand is inflated
and revenue streams are based on
past experience ~~the~~ is not justified.
Need to have a high/normal/low
isotope production estimate/revenue options.

Fold on lines and fasten with tape

Place
stamp
here

**Colette E. Brown, NE-50
U.S. Department of Energy
19901 Germantown Road
Germantown, MD 20874**

**60-2
(Cont'd)**

Response to Commentor No. 60

Commentor No. 61: Kalle H. Hyrkas

From: Kalle_H_Hyrkas@rl.gov%internet
[SMTP:KALLE_H_HYRKAS@RL.GOV]
Sent: Friday, August 11, 2000 4:30:53 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: Support of FFTF Restart (Draft PEIS)
Auto forwarded by a Rule

Hi,

I fully support the restart of the Fast Flux Test Facility
for all viable missions.

Kalle Hyrkas
FFTF Nuclear Training
372_0207

61-1***Response to Commentor No. 61***

61-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 62: Ken Stowell

From: Ken Stowell [mailto:kstowell@bentonrea.com]
 Sent: Friday, August 11, 2000 1:22 AM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: Hanford's FFTF

I'm not sure if this is the place for this type of comment, if it isn't if you could let me know where to submit it I would be glad to.

I fully support the idea of restarting the FFTF facility. I strongly feel it would greatly benefit almost everyone. FFTF has proven its capability and reliability during its early years. It would be a shame to close it down and decommission the facility since it has so many possibilities. I know that people are concerned about the "waste" from the facility but they don't understand that no matter what is done there is a waste product of some type.

Again, to keep it short I would like to see the facility operate once again, it has so many positives it can produce that will certainly out weigh the negatives!!!

Ken Stowell
 P.O. Box 70
 Mabton, WA. 98935
 kstowell@bentonrea.com
 kb7csp@wa7v.#sewa.wa.usa.noam

62-1**Response to Commentor No. 62****62-1:** DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 63: William E. Schenewerk

From: William Schenewerk[SMTP:WILLIAM.SCHENEWERK@PARSONS.COM]

Sent: Wednesday, August 16, 2000 2:15:24 PM

To: INFRASTRUCTURE-PEIS, NUCLEAR

Subject: FFTF Restart 08162000

Auto forwarded by a Rule

From

William Ernest Schenewerk, Ph.D. 5060 San Rafael Ave,
08/16/2000, Los Angeles CA 90042-3239

Home: 323-257-6672 Work: 626-440-3708

william.schenewerk@parsons.com

To:

Ms. Colette Brown, Doe Office of Space and Defence
Power System

Ms. Brown:

I am presently working in chemical demilitarization. I have done nuclear work and hold a California Professional Nuclear Engineer license. I am very much concerned about the fate of FFTF. I enclosed a paper that I am still working on. The future looks bad, even with maximum nuclear power deployment. Absence of nuclear power, we are faced with disaster within 100 years. Breeder reactor deployment should start by 2020 for best results.

Thank You, William E. Schenewerk, Ph.D.

63-1

Response to Commentor No. 63

63-1: DOE notes the commentor's support for Alternative 1, Restart FFTF. None of the missions for which FFTF would be restarted involve fast breeder technology and, although FFTF would be used to test some nuclear fuels, they do not include fast breeder fuels. At present, U.S. policy prohibits the pursuit of breeder reactors and, as noted above, FFTF has other potential uses beyond testing fast breeder reactor technology.

Commentor No. 64: Daniel Axelrod

Response to Commentor No. 64

NI PEIS Toll-Free Telephone

08/23/00

Daniel Axelrod
Candidate for President of the United States
105 East Geneva Lane
Oak Ridge, TN 37830

This is Mr. Daniel Axelrod from Oak Ridge, Tennessee. I testified at length last night at the public hearing. I don't recall in my oral statement if I mentioned the source for World Estimated Ultimately Recoverable Oil 2000. The source was Popular Science, May 2000, page 56. It was based on the oil and gas journal. Please add that note to my transcribed testimony if possible or as a supplementary comment. I would appreciate if you would send me a copy of my transcript of my statement.

Ms. Brown can indicate when she mails out the transcript if she wants me to send the copy of the letter from Secretary Richardson if she has not obtained it from him directly. Out.

64-1

64-1: DOE noted the source indicated.

Commentor No. 65: Bobby Flowers

NI PEIS Toll-Free Telephone

08/23/00

Bobby Flowers
418 W. 17th Street
Apartment 22A
New York, NY 10011
212-242-0319

Hi. Good afternoon, Bobby Flowers calling from
New York City.

The reason why I am calling is I want to protest
expansion of the Nuclear Power for Space
Missions. Thank you have a good day. Thank you.

65-1

Response to Commentor No. 65

65-1: DOE notes the commentor's opposition to enhancing its existing nuclear facility infrastructure to support production of plutonium-238 for use in future NASA space exploration missions. Through a Memorandum of Understanding with NASA, DOE provides radioisotope power systems, and the plutonium-238 that fuels them, for space missions that require or would be enhanced by their use. NASA makes the final determination, through its own NEPA process, whether or not these radioisotope power systems would be used to support individual NASA space exploration missions; this is not a DOE decision. Section 1.2.2 of Volume 1 was revised to further clarify the purpose and need for reestablishing a domestic plutonium-238 production capability to support NASA space exploration missions.

Commentor No. 66: John Saemann

NI PEIS Toll-Free Telephone

8/19/00

John Saemann
1775 Atkins Street
#2
Eugene, Oregon 97401
541-687-7712

This is John Saemann calling from Eugene, Oregon, to make a statement on the Nuclear Infrastructure Programmatic Environmental Impact Statement. I would like to go on record as preferring the no action alternative regarding the production of Pu-238 for future NASA space missions and civilian nuclear energy research and development activities. I oppose building any new accelerators or restarting the Fast Flux Test Facility and I believe we need not, we should not, make it easier to have more Pu-238 available for whatever use is claimed.

Let's first clean up the mess that we made and not go any further until that's taken care of.

Thank you.

66-1

66-2

66-3

66-4

Response to Commentor No. 66

- 66-1:** DOE notes the commentor's support for the No Action Alternative and opposition to Alternative 3, Construct New Accelerator(s), and Alternative 1, Restart FFTF.
- 66-2:** See response to comment 66-1.
- 66-3:** The commentor's opposition to the production and availability of plutonium-238 is noted. However, the United States has been using radioisotope power sources in space safely and reliably for approximately 40 years. In accordance with the Atomic Energy Act of 1954, DOE is obligated to continue supporting NASA in the use of radioisotope power sources. NASA has determined that it will continue to require plutonium-238 for power sources and heating in deep space missions.
- 66-4:** DOE notes the commentor's concerns regarding the cleanup of existing contaminants at the Hanford Site. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

The Hanford Site has a comprehensive waste minimization and pollution prevention program in place as summarized in Volume 1, Section 3.4.11.8, that would control any new site activities.

Commentor No. 67: John Saemann

NI PEIS Toll-Free Telephone

08/24/00

John Saemann
541-687-7112

We looked at some more at the NI PEIS and out of a bad deal I think most desirable one alternative seems to be to us the option of purchasing Pu-238 from Russia through the existing contract. That's probably the best of a bunch of bad deals. Ideally we shouldn't proceed with it at all but if you gotta have some Pu-238 then probably the best way to proceed is to obtain from Russia. Thank you very much for asking for public comment, but I suspect you probably are going to do what the DOE wants to do in the first place. Anyway, lots of luck to you and thanks for spending taxpayer money on something we really don't need.

Goodbye.

67-1

67-2

Response to Commentor No. 67

67-1: DOE could purchase plutonium-238 from Russia to satisfy its responsibility to supply NASA with the necessary fuel to support future space exploration missions. Under the current contract set to expire in 2002, the United States is authorized to purchase up to 40 kilograms of plutonium-238, with the total available for purchase in any one year limited to 10 kilograms. To date, DOE has purchased approximately 9 kilograms of plutonium-238 under this contract. Under the No Action Alternative, DOE would continue to purchase plutonium-238 to meet the space mission needs for the 35-year evaluation period considered in the NI PEIS. However, DOE recognizes that any purchase beyond what is currently available to the United States through the existing contract would likely require negotiation of a new contract and may require additional NEPA review.

For supply reliability reasons and concern of nuclear nonproliferation, DOE's preference is to establish a domestic plutonium-238 production capability. Section 1.2.2 of Volume 1 was revised to further clarify the purpose and need for reestablishing a domestic plutonium-238 production capability to support NASA space exploration missions.

67-2: DOE policy encourages effective public participation in its decision-making process. In compliance with NEPA and CEQ regulations, DOE provided opportunity to the public to comment on the scope of the NI PEIS and the environmental impact analysis of DOE's proposed alternatives. DOE gave equal consideration to all comments. In preparing the Final NI PEIS, DOE carefully considered comments received from the public.

Commentor No. 68: Karen Kotchek

NI PEIS Toll-Free Telephone

8/16/00

Karen Kotchek
1711 Elview Avenue
Apartment 402
Seattle, WA 98122

Hello. I don't agree with any further action to restart the Hanford project in any way shape or form. No Fast Flux Test Facility. Nothing. We should just clean it up and shut it down for good.

Please send me any literature. Thank you.

68-1

Response to Commentor No. 68

68-1: DOE notes the commentor's support for Alternative 5, Permanently Deactivate FFTF. DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

Commentor No. 69: Harold W. and Ann E. Willis

Response to Commentor No. 69

Draft PEIS Comment Form

We need FFTF please Restart it

69-1

69-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): *Harold W. & Ann E. Willis*

Organization: _____

Home/Organization Address (circle one): *7587 Ambler Ln.*

Manassas Va. 20111

City: *Manassas* State: *Va* Zip Code: *20111*

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Commentor No. 72: Keith N. Woods

From: KWoods1507@aol.com%internet
[SMTP:KWOODS1507@AOL.COM]
Sent: Friday, August 25, 2000 10:18:26 AM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: Restart FFTF!
Auto forwarded by a Rule

Please re_start FFTF for medical isotopes.

Keith N. Woods
Richland, WA 99352

72-1

Response to Commentor No. 72

72-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 73: Laurence Kirby

From: Laurence Kirby[SMTP:VANINI@NETSTEP.NET]
 Sent: Thursday, August 24, 2000 10:42:01 AM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: comment
 Auto forwarded by a Rule

This is a comment on some of the proposals for use of nuclear power in the Draft Programmatic Environmental Impact Statement.

I strongly oppose expanding the use of nuclear power in space missions, which poses significant danger to Earth before and during launching, and pollutes the extra_terrestrial environment. Production and use of Pu_238 for deep_space probes is highly contaminating and dangerous; the idea of nuclear reactors on Mars is shocking and horrifying. Solar power is adequate to provide operating power for space probes, and alternatives to nuclear_powered rockets are safer and already well developed.

The lessons of the 20th century with regard to nuclear power have to be learned: the many disasters, the radioactive pollution, the gigantic problem of waste, the dangers of terrorism, the high costs (both economic and social), and the long list of uneconomic, dangerous, polluted reactors that are now closed or will soon have to be. A program like the DOE's should be geared toward developing technologies for our future, not preserving the vested interests of outmoded, discredited technologies such as nuclear power. Investment in solar and other environmentally safer technologies is called for.

Laurence Kirby
 Professor of Mathematics
 Baruch College
 City University of New York

73-1

Response to Commentor No. 73

73-1: DOE notes the commentor's opposition to NASA's use of nuclear materials for space missions. Through a Memorandum of Understanding with NASA, DOE provides radioisotope power systems, and the plutonium-238 that fuels them, for space missions that require or would be enhanced by their use. These radioisotope power systems have been used for almost 40 years, and have repeatedly demonstrated their performance, safety, and reliability in various NASA space missions. NASA establishes the need and requirements for space missions and undergoes a thorough NEPA evaluation for each launch.

73-2

73-2: The commentor's opposition to nuclear technology for space applications is noted. DOE also notes the commentor's interest in alternative energy sources [i.e., solar energy], although issues of research and development of alternative energy sources are beyond the scope of this NI PEIS. Other offices of DOE are responsible for the research and development of alternative energy sources. The missions to be addressed in this PEIS, which include the production of medical and industrial isotopes, the production of plutonium-238, and nuclear research and development, can currently only be met using nuclear reactor or accelerator technologies.

Commentor No. 74: G. E. Craig Doupe

From: Craig Doupe[SMTP:DOUPE@EMAIL.MSN.COM]
 Sent: Wednesday, August 23, 2000 12:57:49 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: FFTF
 Auto forwarded by a Rule

The nation needs medical isotopes. Please restart FFTF.

G. E. Craig Doupe'
 (509)628_1937
 Fax (509) 628_8184

74-1

Response to Commentor No. 74

74-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 75: Steve Binney

From: Steve Binney[SMTP:BINNEYS@ENGR.ORST.EDU]
 Sent: Friday, August 25, 2000 1:17:37 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Cc: Niles, Ken; _NE_faculty; Schenter, Bob
 Subject: Draft PEIS comment
 Auto forwarded by a Rule

As a Professional Nuclear Engineer and someone who has worked on the production of medical isotopes, I readily recognize the value and uniqueness of the Fast Flux Test Facility (FFTF). Although its original breeder reactor mission has long since vanished, it is nevertheless a particularly viable resource for the production of medical and industrial isotopes. Its high power, hard neutron spectrum, and large irradiation volumes offer great potential for not only producing high specific activities of commonly used isotopes, but also adequate quantities of lesser used research isotopes. It is hard to assign an economic value to the research isotopes. If new research isotopes were more reliably available, especially for diagnostic and therapeutic nuclear medicine procedures, researchers could take advantage of these isotopes to develop even better radiopharmaceuticals. Unfortunately, with an inadequate and irregular supply of these isotopes, researchers can't explore these areas because of cost and the uncertainty of isotope supply. There's no denying that new isotopes are costly; nonetheless they shouldn't be expected to pay their own way. What will prove to be financially beneficial in the long run is the improved health care that comes from newly developed radioisotope procedures.

75-1

Response to Commentor No. 75

75-1: DOE notes the commentor's support for Alternative 1, Restart FFTF. Cost/benefit analyses are normally required in connection with government regulatory actions. While it is plausible that the benefits of medical isotopes far outweigh the costs and risks, the NI PEIS is focused on the environmental impacts that would result from implementation of the alternatives described in Section 2.5 of Volume 1.

Commentor No. 75: Steve Binney (Cont'd)

In that regard, when considering the options of an EIS, consideration needs to be taken not only of the direct costs of operating a facility such as the FFTF and of the value of the isotopes produced, but also of the later costs saved by those isotopes. Although I can't quantify this statement, I would estimate it is conservative to say that for every dollar spent on producing medical isotopes, ten or more dollars are saved in health costs from improved diagnoses and elimination of subsequent costly and unnecessary surgeries. This hidden, but colossal, reduction in health care costs from improved diagnosis alone needs to be considered as a direct impact of operation of a facility such as FFTF.

Based on these and other concerns not mentioned, I strongly urge the adoption of Alternative 1 (Restart FFTF).

Stephen E. (Steve) Binney, Ph.D.
Director, Radiation Center
Professor of Nuclear Engineering and Radiation Health Physics
100 Radiation Center
Oregon State University
Corvallis, OR 97331_5903

Phone: (541)737_2344
Fax: (541)737_0480
Internet: binneys@rc.orst.edu

75-1
(Cont'd)

Response to Commentor No. 75

Commentor No. 76: Tom Cowan

From: Tom Cowan[SMTP:TCOWAN@COWANWALKER.COM]
Sent: Thursday, August 24, 2000 8:10:37 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: Fast Flux Test Facility
Auto forwarded by a Rule

The FFTF is needed for the production of medical isotopes for the treatment of cancer and heart disease. It will also fulfill the need for space batteries, hardening computer chips and for research.

76-1

It would be criminal for DOE to waste over \$1 Billion of taxpayers' investment by scrapping this magnificent facility.

76-2**Response to Commentor No. 76**

76-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

76-2: DOE notes the commentor's statement about wasting money by scrapping FFTF.

Commentor No. 77: Jane Davis

From: Jane Davis[SMTP:JADAVIS@3_CITIES.COM]
Sent: Friday, August 25, 2000 1:44:15 AM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: FFTF
Auto forwarded by a Rule

Please re_start the FFTF for the production of medical isotopes.

Respectfully yours,

Jane A. Davis

77-1

Response to Commentor No. 77

77-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 78: Ben Asher

From: Ben[SMTP:BPRACTICAL@YAHOO.COM]
 Sent: Friday, August 25, 2000 2:40:02 AM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: Hanford
 Auto forwarded by a Rule

To whom it may concern:

I urge you not to allow the proposed reopening of the Hanford reactor. The site already has plenty of radioactive waste that no one really knows how to dispose of. Reopening the reactor would only produce more waste, and the reasons cited for reopening it are flimsy. Thank you for your time.

Sincerely,
 Ben Asher
 Seattle

78-1

Response to Commentor No. 78

78-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF. DOE notes the commentor's concerns regarding existing wastes and cleanup missions at Hanford. Although beyond the scope of this NI PEIS ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

Commentor No. 79: Bennett H. Orren

From: Bhorren@aol.com%internet
[SMTP:BHORREN@AOL.COM]
Sent: Thursday, August 24, 2000 1:58:47 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: Medical Isotopes
Auto forwarded by a Rule

Please re_start FFTF for Medical Isotopes.

Thank You, Bennett H. Orren

79-1

Response to Commentor No. 79

79-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 80: Holly G. Graham

From: Holly Gwinn Graham
 [SMTP:DRAGONFLY100@HOTMAIL.COM]
 Sent: Thursday, August 24, 2000 7:16:16 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: No more nuclear proliferation
 Auto forwarded by a Rule

Dear Ms. Brown:

There is no excuse for the US continuing nuclear works of any kind in an age when to do so only destabilizes the fragility of our relationships with other countries. The US is acting like a terrorist nation by continuing this aggression, not ratifying the CTBT, and trying to abrogate the ABM Treaty. I am ashamed of this behaviour!

WE DO NOT NEED THE FAST FLUX REACTOR AT HANFORD TO BE REOPENED. WE DO NOT WANT STAR WARS, NUCLEAR BASED LASERS IN SPACE, BALLISTIC MISSILE DEFENSE PROGRAMS, INEPT AND UNPROVEN TECHNOLOGIES THAT WAGE DEATH AND DESTRUCTION AND POVERTY UPON THE PEOPLE OF EARTH IN THE NAME OF US SUPREMACY. Please, stop this insanity now.

We shut down the N_Reactor because it was filthy, spewing contaminants across the Downwind area throughout its existence. We were supposed to spend the money that's been used to keep those reactors on standby to SHUT THEM DOWN FOREVER AND CLEAN THEM UP. We told DOE in meetings in Seattle in 1998 that we do not want or need Tritium, or anything the Fast Flux Reactor can give us. We stated clearly then (hundreds of people) that we wanted Hanford cleaned up, and not reopened. You have not listened to us, but I guess because we are just the citizens, and not corporations who will gain billions by perpetuating this Obscene technology, we have no voice with our own agencies.

Response to Commentor No. 80

80-1: The pursuit of DOE's isotope and nuclear technology missions help rather than hurt our relationship with other nations, and are consistent with the policies and goals of the United States, including nuclear nonproliferation. In addition to the NEPA review, potential nonproliferation impacts of the alternatives evaluated in the PEIS have been assessed in a separate Nuclear Nonproliferation Impact Assessment. This report confirms that the alternatives are neither related to nuclear weapons production nor inconsistent with nonproliferation policy.

No radioactive materials were "released" in the Hanford Wildfires of 2000. Wildfires did resuspend some materials already in the environment. The resuspended materials were low, slightly above natural background levels. The low levels required several days of analysis to quantify.

80-2: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

80-3: DOE was tasked by Congress in the Atomic Energy Act of 1954, as amended, to "ensure the availability of isotopes for medical, industrial, and research applications, meeting the nuclear material needs of other federal agencies, and undertaking research and development of activities related to development of nuclear power for civilian use." The purpose of this PEIS is to determine the environmental and other impacts to accomplishing this mission from all reasonable existing and new DOE resources. The FFTF at the Hanford Site was one of several existing DOE resources that was assessed for this mission.

DOE notes the commentor's opposition to the use of FFTF for the enhancement of its nuclear facility infrastructure. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

Since all missions are for civilian purposes, production of tritium for defense use is not included in this PEIS.

80-4: In compliance with NEPA and CEQ regulations, DOE provided opportunity to the public to comment on the scope of the NI PEIS and

Commentor No. 80: Holly G. Graham (Cont'd)

So I am saying yet again, NO TO YOUR PLANS! NO TO THE FAST FLUX REACTOR. NO TO STAR WARS. NO BMD. NO TMD. NO BILLIONS TO SUPPORT FOOLHARDY TECHNOLOGY TOSSED INTO WAR ON EARTH AND CONTROL OF EARTH FROM SPACE. NO TO US MILITARY SPENDING IN THE FACE OF THE THINGS WE NEED TO ACCOMPLISH ON THIS PLANET FOR THE INHABITANTS. YES TO PEACEFUL PURSUITS, NO TO MORE WEAPONRY. NO TO THE IDIOT "VISION FOR 2020" OFFERED BY THE AIR FORCE.

We are fortunate the fires at Hanford and Los Alamos were contained. There were still horrible radiation leakages, as you well know. What can be wrong with official thinking, to not realize the utter stupidity of continuing a nuclear attitude in this new millenium?

Add my voice to the millions of Americans who say NO MORE PROLIFERATION OF THIS NUCLEAR MADNESS! SHUT IT DOWN AND CLEAN IT UP!

Sincerely,

Holly G. Graham
Olympia, WA

80-2

80-1

Response to Commentor No. 80

the environmental impact analysis of DOE's proposed alternatives. DOE gave equal consideration to all comments. In preparing the Final NI PEIS DOE carefully considered comments received from the public. DOE's Record of Decision for the NI PEIS will be based on a number of factors including environmental impacts, public input, costs, nonproliferation impacts, schedules, technical assurance, and other policy and programmatic objectives.